

PS Form 3811, July 1983 447-845

NPDPS Permit

DOMESTIC RETURN RECEIPT

SENDER: Complete items 1, 2, 3 and 4.

Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for service(s) requested.

- ☒ Show to whom, date and address of delivery.
- ☐ Restricted Delivery.

3. Article Addressed to:
FRANK HACKMAN, Associate Counsel
Ralston Purina Company
Checkerboard Square
ST. Louis, Missouri 63164

4. Type of Service: Article Number

<input type="checkbox"/> Registered	<input type="checkbox"/> Insured
<input checked="" type="checkbox"/> Certified	<input type="checkbox"/> COD
<input type="checkbox"/> Express Mail	

P000578600

Always obtain signature of addressee or agent and **DATE DELIVERED.**

5. Signature - Addressee
X

6. Signature - Agent
X *Janie Brown*

7. Date of Delivery
FEB - 9 1987

8. Addressee's Address (ONLY if requested and fee paid)

A20000027

P 000 578 600

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

(See Reverse)

* U.S.G.P.O. 1984-446-014

PS Form 3800, Feb. 1982

Sent to	Frank Hackman
Street and No.	Associate Counsel
P.O., State and ZIP Code	Ralston Purina Co.
Postage	Checkerboard Square
Certified Fee	ST. Louis, Missouri
Special Delivery Fee	6 3/64
Restricted Delivery Fee	
Return Receipt Showing to whom and Date Delivered	
Return receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date	

PS Form 3811, July 1983 447-845

Timing 52047

DOMESTIC RETURN RECEIPT

SENDER: Complete items 1, 2, 3 and 4.

Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for service(s) requested.

1. ☒ Show to whom, date and address of delivery.

2. ☐ Restricted Delivery.

3. Article Addressed to:
Manley Sarnowsky, Plant Manager
Samoa Packing Co, Inc.
P.O. Box 957
Pago Pago, American Samoa 96799

4. Type of Service: Article Number

☐ Registered ☐ Insured P000 578 599

☒ Certified ☐ COD

☐ Express Mail

Always obtain signature of addressee or agent and **DATE DELIVERED.**

5. Signature - Addressee
 X *[Signature]*

6. Signature - Agent
 X

7. Date of Delivery

8. Addressee's Address (ONLY if requested and fee paid)



A2000027

P 000 578 599

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
 NOT FOR INTERNATIONAL MAIL

(See Reverse)

★ U.S.G.P.O. 1984-446-014

PS Form 3800, Feb. 1982

Sent to	Manley Sarnowsky
Street and No.	Plant Manager
P.O., State and ZIP Code	Samoa Packing Co.
Postage	P.O. Box 957
Certified Fee	Pago Pago, America
Special Delivery Fee	Samoa
Restricted Delivery Fee	96799
Return Receipt Showing to whom and Date Delivered	
Return receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date	



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

215 Fremont Street
San Francisco, Ca. 94105

In Reply
Refer to: Sheila Wiegman (W-1-1)

0 4 FEB 1987

Frank H. Hackmann
Associate Counsel
Ralston Purina Company
Checkerboard Square
St. Louis, Missouri 63164

Dear Mr. Hackmann:

A National Pollutant Discharge Elimination System (NPDES) permit has been issued to the following discharger:

Samoa Packing Company, Inc.
NPDES Permit No. AS0000027

The staff at the Environmental Protection Agency (EPA) has reviewed the NPDES permit application for this facility and has prepared a draft permit, in accordance with the Clean Water Act, as amended. The EPA has also published a public notice of its intent to issue a permit to the above discharger. After considering the expressed views of all interested persons and agencies, pertinent Federal statutes and regulations, the EPA, pursuant to 40 CFR 124, has prepared a final permit which does not differ significantly from the draft permit. Changes to the permit are discussed in the enclosed "Response to Comments."


The NPDES permit is hereby issued upon the date of signature and shall become effective 33 days from the date of mailing, unless there is a written request for an evidentiary hearing. Pursuant to 40 CFR 124.76, requests for an evidentiary hearing must state each of the legal or factual questions alleged to be at issue and must demonstrate one of the following for each issue being raised in the hearing request: that the issue was raised during the public comment period; that the issue was not reasonably ascertainable during the public comment period; or the requester could not have reasonably anticipated the relevance

or materiality of the issue during the comment period. Any request for an evidentiary hearing must be submitted within 33 days from the permit's signature date to Sheila Wiegman (W-1-1) at the above address.

The EPA will issue a decision to grant or deny an evidentiary hearing within 63 days of the permit's signature date. Also, the EPA will routinely deny any evidentiary hearing request which raises only legal issues. Any denial of a request for an evidentiary hearing may be appealed to the Administrator within 30 days of the date of notice of the denial.

If you have any questions regarding the procedures outlined above, please contact Sheila Wiegman of my staff at (415) 974-8270.

Sincerely,



Norman L. Lovelace, Chief
Office of Territorial Programs
Water Management Division

Enclosures

cc: Pati Faiai, Environmental Quality Commission
U.S. Army Corps of Engineers, HI
U.S. Dept. of Interior, HI
U.S. Fish and Wildlife Service, HI
U.S. National Marine Fisheries Service, HI

Permit No. AS0000027

AUTHORIZATION TO DISCHARGE UNDER THE
NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM

In compliance with the provisions of the Federal Water Pollution Control Act, as amended, (33 U.S.C. 1251 et. seq.; the "Act"),

Samoa Packing Company, Inc.
Pago Pago, Tutuila
American Samoa 96799

is authorized to discharge

tuna processing wastewater (discharge 001 at 14° 16' 26.5" S latitude,
170° 41' 8" W longitude)

from the Samoa Packing Company Tuna Cannery located at Pago Pago, American Samoa
to receiving waters named Pago Pago Harbor

in accordance with effluent limitations, monitoring requirements and other
conditions set forth in Parts I, II and III hereof.

This permit shall become effective on March 8 , 1987.

This permit and the authorization to discharge shall expire at midnight,
March 7 , 1992.

Signed this 3rd day of February , 1987.

For the Regional Administrator

James E. Thompson
Acting Director
Water Management Division

PART I

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS (based on a maximum production rate of 320 tons/day of seafood processed and an approximate flow rate of 0.72 MGD)

1. During the period beginning with (March 8, 1987) and lasting through (March 7, 1988), the permittee is authorized to discharge from Outfall Serial No. 001 (tuna processing wastewater).

a. Such discharges shall be limited and monitored by the permittee as specified below:

Effluent Characteristic	Discharge Limitations			Monitoring Requirements	
	loading		concentration	Measurement Frequency	Sample Type
	Monthly Average	Daily Maximum	in mg/l Monthly Average		
Flow (MGD)	(d)	(d)	-	Continuous	Continuous
Temperature (°F)	(d)	90	-	Continuous	Continuous
BOD5 (lbs/day)	(d)	(d)	(d)	Twice weekly	Composite
pH (Standard Units)	(e) Not less than 6.5 and not greater than 8.6			Continuous	Continuous
Total Suspended Solids (lbs/day)	2,100	5,300	(d)	Twice weekly	Composite
Total Suspended Solids (lbs/1000 lbs seafood)	3.3	8.3		Twice weekly	Calculated
Oil and Grease (a)(b) (lbs/day)	540	1,300	(d)	Twice weekly	Composite
Oil and Grease (a)(b) (lbs/1000 lbs seafood)	0.84	2.1	-	Twice weekly	Calculated
Total Nitrogen (b) (lbs/day)	(d)	(d)	(d)	Twice weekly	Composite
Total Phosphorus (b) (lbs/day)	(d)	(d)	(d)	Twice weekly	Composite

(a) The test procedure for the analysis of oil and grease shall comply with the method described in the manual of "Methods for Chemical Analysis of Water and Wastes," 1974, EPA, Methods Development and Quality Assurance Research Laboratory, page 229 (with written EPA approval for non-substantive changes) or an alternate procedure approved in accordance with the procedures specified in regulations published pursuant to Section 304(h) of the Act.

(b) Samples shall be taken concurrently.

(d) Reporting required only.

(e) The total time during which the pH values are outside the required range of pH values shall not exceed 7 hours and 26 minutes in any calendar month; and no individual excursions from the range of pH values shall exceed 60 minutes.

PART I

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS (based on a maximum production rate of 320 tons/day of seafood processed and an approximate flow rate of 0.72 MGD)

2. During the period beginning (March 8, 1988) and lasting through (March 7, 1991), the permittee is authorized to discharge from Outfall Serial No. 001 (tuna processing wastewater).

a. Such discharges shall be limited and monitored by the permittee as specified below:

Effluent Characteristic	Discharge Limitations			Monitoring Requirements	
	loading		concentration	Measurement Frequency	Sample Type
	Monthly Average	Daily Maximum	in mg/l Monthly Average		
Flow (MGD)	(d)	(d)	-	Continuous	Continuous
Temperature (°F)	(d)	90	-	Continuous	Continuous
BOD5 (lbs/day)	(d)	(d)	(d)	Twice weekly	Composite
pH (Standard Units)(e)	Not less than 6.5 and not greater than 8.6			Continuous	Continuous
Total Suspended Solids (lbs/day)	2,100	5,300	(d)	Twice weekly	Composite
Total Suspended Solids (lbs/1000 lbs seafood)	3.3	8.3	-	Twice weekly	Calculated
Oil and Grease (a)(b) (lbs/day)	540	1,300	(d)	Twice weekly	Composite
Oil and Grease (a)(b) (lbs/1000 lbs seafood)	0.84	2.1	-	Twice weekly	Calculated
Total Nitrogen (b) (lbs/day)	820	1,800	(d)	Twice weekly	Composite
Total Phosphorus (b) (lbs/day)	33	100	(d)	Twice weekly	Composite

(a) The test procedure for the analysis of oil and grease shall comply with the method described in the manual of "Methods for Chemical Analysis of Water and Wastes," 1974, EPA, Methods Development and Quality Assurance Research Laboratory, page 229 (with written EPA approval for non-substantive changes) or an alternate procedure approved in accordance with the procedures specified in regulations published pursuant to Section 304(h) of the Act.

(b) Samples shall be taken concurrently.

(d) Reporting required only.

(e) The total time during which the pH values are outside the required range of pH values shall not exceed 7 hours and 26 minutes in any calendar month; and no individual excursions from the range of pH values shall exceed 60 minutes.

PART I

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS (based on a maximum production rate of 320 tons/day of seafood processed and an approximate flow rate of 0.72 MGD)

3. During the period beginning with (March 8, 1991) and lasting through (March 7, 1992), the permittee is authorized to discharge from Outfall Serial No. 001 (tuna processing wastewater).

a. Such discharges shall be limited and monitored by the permittee as specified below:

<u>Effluent Characteristic</u>	<u>Discharge Limitations</u>			<u>Monitoring Requirements</u>	
	<u>loading</u>		<u>concentration in mg/l</u>	<u>Measurement Frequency</u>	<u>Sample Type</u>
	<u>Monthly Average</u>	<u>Daily Maximum</u>	<u>Monthly Average</u>		
Flow (MGD)	(d)	(d)	-	Continuous	Continuous
Temperature (°F)	(d)	85	-	Continuous	Continuous
BOD5 (lbs/day)	(d)	(d)	(d)	Twice weekly	Composite
pH (Standard Units)(e)	Not less than 6.5 and not greater than 8.6			Continuous	Continuous
Total Suspended Solids (lbs/day)	2,100	5,300	(d)	Twice weekly	Composite
Total Suspended Solids (lbs/1000 lbs seafood)	3.3	8.3	-	Twice weekly	Calculated
Oil and Grease (a)(b) (lbs/day)	540	1,300	(d)	Twice weekly	Composite
Oil and Grease (a)(b) (lbs/1000 lbs seafood)	0.84	2.1	-	Twice weekly	Calculated
Total Nitrogen (b)(c)	-	-	0.20	Twice weekly	Composite
Total Phosphorus (b)(c)	-	-	0.03	Twice weekly	Composite

(a) The test procedure for the analysis of oil and grease shall comply with the method described in the manual of "Methods for Chemical Analysis of Water and Wastes," 1974, EPA, Methods Development and Quality Assurance Research Laboratory, page 229 (with written EPA approval for non-substantive changes) or an alternate procedure approved in accordance with the procedures specified in regulations published pursuant to Section 304(h) of the Act.

(b) Samples shall be taken concurrently.

(c) Median monthly value may not exceed the given limitation. In addition, 10% of the sample results obtained during the month may not exceed 0.35 mg/l for total nitrogen, or 0.06 mg/l for total phosphorus.

(d) Reporting required only.

(e) The total time during which the pH values are outside the required range of pH values shall not exceed 7 hours and 26 minutes in any calendar month; and no individual excursions from the range of pH values shall exceed 60 minutes.

4. During the period beginning with (March 8, 1987) and lasting through (March 7, 1992), the discharges from Outfall Serial No. 001 shall also be limited by the permittee as follows:
 - a. There shall be no discharge of floating solids or visible foam in other than trace amounts.
 - b. Samples taken in compliance with the monitoring requirements specified above shall be taken at the discharge of Outfall Serial No. 001. Effluent samples shall be taken downstream from the treatment works prior to mixing with the receiving waters.
 - c. There shall be no discharge of toxic substances that violate the water quality standards for the Territory of American Samoa.
 - d. The discharge shall not cause objectionable odors at the surface of the receiving waters.

5. Toxic Substance Monitoring Program

During the period beginning (March 8, 1987) and lasting through (March 7, 1992), the discharges from Outfall Serial No. 001 shall also be monitored as follows:

Cannery effluent shall be sampled and reported twice yearly at Outfall Serial No. 001 for cadmium, chromium, lead, mercury, and zinc.

6. Current Monitoring Program

The permittee, jointly with Star-Kist (NPDES permit No. AS0000019), shall establish with the American Samoa Government a current monitoring program to obtain data necessary to evaluate alternate discharge locations.

7. Receiving Water Monitoring Program

The permittee, jointly with Star-Kist (NPDES permit No. AS0000019), shall perform or cause to be performed, the following receiving water monitoring program established in Pago Pago Harbor.

<u>Parameter</u>	<u>Units</u>	<u>Stations*</u>	<u>Frequency</u>	<u>Sample Type</u>
Temperature	°C	5-13	Monthly	Discrete
pH	Standard Units	5-13	Monthly	Discrete
Dissolved Oxygen	mg/L	5-13	Monthly	Discrete
Suspended Solids	mg/L	5-13	Monthly	Discrete
Light Penetration	ft	5-13	Monthly	Discrete
Turbidity	NTU	5-13	Monthly	Discrete
Salinity	ppt	5-13	Monthly	Discrete
Total Nitrogen	ug/L	5-13	Monthly	Discrete
Total Phosphorus	ug/L	5-13	Monthly	Discrete

- * The station locations shall be the historical stations designated by the American Samoa Environmental Protection Agency. These measurements shall be taken at 3-foot and 60-foot depths with the exception of Station 13 where measurements shall be taken at the 3-foot and 30-foot depths.

8. Quality Assurance/Quality Control

All waste material sampling procedures, analytical protocols, and quality assurance/quality control procedures shall be performed in accordance with guidelines specified by EPA Region 9. The following references shall be used by the permittee where appropriate:

- a. EPA, 40 CFR 136, Guidelines Establishing Test Procedures for the Analysis of Pollutants Under the Clean Water Act;
- b. Tetra Tech, Inc. 1985. Summary of U.S. EPA-approved methods, standard methods and other guidance for 301(h) monitoring variables. Final program document prepared for the Marine Operations Division, Office of Marine and Estuarine Protection, U.S. Environmental Protection Agency. EPA Contract No. 68-01-693. Tetra Tech, Inc., Bellevue, Wa.; and
- c. Tetra Tech, Inc. 1986. Quality assurance and quality control guidance for 301(h) monitoring programs. Final program document prepared for document prepared for the Marine Operations Division, Office of Marine and Estuarine Protection, U.S. Environmental Protection Agency. EPA Contract No. 68-01-3968. Tetra Tech, Inc., Bellevue, Wa.

B. SCHEDULE OF COMPLIANCE

1. The permittee shall submit a report to EPA and the American Samoa Government (ASG) which describes and evaluates the alternatives for achieving compliance with the water quality standards of American Samoa. The alternatives shall be those chosen by the permittee in consultation with the ASG and capable of achieving compliance with the water quality standards within four years of the effective date of this permit. The selection of alternatives shall reflect any decision made by the ASG on the permittee's pending application for a mixing zone under paragraph V.B of the water quality standards and may also assume, with the concurrence of the ASG, technical modifications to paragraph V.B.g. of the water quality standards regarding methodology for calculating mixing zones as they may relate to consideration of far field dilution. The report shall be submitted no later than 18 months after the effective date of this permit.
2. The permittee shall select one of the alternatives described in the report to be completed pursuant to I.B.1 and submit a schedule of implementation to EPA and ASG. The schedule shall specify, at a minimum:
 - a. The chosen alternative.
 - b. The date by which the permittee will apply to the ASG for a mixing zone, if a mixing zone would be needed to achieve compliance with the water quality standards.
 - c. The date by which any necessary facility modifications and/or new facility construction will be commenced.
 - d. The date by which the chosen alternative will be fully operational.
3. The schedule must be approved by both the EPA and ASG. Upon such approval, and notice and opportunity for public comment, the permit shall be reopened and modified to include schedule and the dates contained therein to bring the discharges into compliance with applicable water quality standards. The schedule shall be submitted no later than 24 months after the effective date of this permit.

4. The permittee shall comply with effluent limitations and conditions established in Parts I.A. and I.B.1.-I.B.3. in accordance with the following schedule of compliance.

The permittee shall:

- a. Achieve compliance with the effluent limits established in Parts I.A.1., I.A.4., and I.A.5. by (March 8, 1987).
- b. Achieve compliance with the effluent limits established in Part I.A.2. by.....(March 7, 1988)
- c. Submit a report to EPA and Government of American Samoa confirming compliance with the Part I.A.2. effluent limits by....(March 21, 1988)
- d. Submit a report to EPA and Government of Samoa describing and evaluating alternatives for achieving within four years compliance with the water quality standards of American Samoa.....(October 5, 1988)
- e. Submit a schedule of implementation of the alternative selected in Part I.B.2 to EPA and Government of American Samoa.....(March 21, 1989)
- f. Submit a report to EPA and Government of American Samoa which evaluates progress towards achieving compliance with effluent limits necessary for achieving water quality standards set forth in Part I.A.3. by.....(March 21, 1990)
- g. Achieve compliance with the effluent limits necessary for achieving water quality standards set forth in Part I.A.3. by.....(March 7, 1991)
- h. Submit a report to EPA and Government of American Samoa confirming compliance with the effluent limits necessary for achieving water quality standards set forth in Part I.A.3. by.....(March 21, 1991)

C. MONITORING AND RECORDS

1. Representative Sampling

Samples and measurements taken as required herein shall be representative of the volume and nature of the monitored discharge.

2. Monitoring Procedures

Monitoring must be conducted according to test procedures approved under 40 CFR Part 136, unless other test procedures have been specified in this permit.

3. Penalties for Tampering

The Act provides that any person who falsifies, tampers with, or knowingly renders inaccurate any monitoring device or method required to be maintained under this permit shall, upon conviction, be punished by a fine of not more than \$10,000 per violation, or by imprisonment for not more than 6 months per violation, or by both.

4. Reporting of Monitoring Results

Monitoring results obtained during the previous 3 months shall be summarized for each month and submitted quarterly on forms to be supplied by the Regional Administrator, to the extent that the information reported may be entered on the forms. The results of all monitoring required by this permit shall be submitted in such a format as to allow direct comparison with the limitations and requirements of this permit. Unless otherwise specified, discharge flows shall be reported in terms of the average flow over each 30-day period and the maximum daily flow over that 30-day period. Monitoring reports shall be postmarked no later than the 28th day of the month following the completed reporting period. The first report is due on July 28, 1987.

Signed copies of these, and all other reports required herein, shall be submitted to the Regional Administrator and the Government of American Samoa at the following address:

Regional Administrator
Environmental Protection Agency
Region 9, Attn: W-1-1
215 Fremont Street
San Francisco, CA 94105

Executive Secretary
Environmental Quality Commission
Government of American Samoa
Tutuila, Pago Pago
American Samoa 96920

5. Definitions

- a. The "monthly average" discharge means the total discharge by weight during a calendar month divided by the number of days in the month that the production or commercial facility was operating. Where less than daily sampling is required by this permit, the monthly average discharge shall be determined by the summation of all the measured daily discharges by weight divided by the number of days during the calendar month when the measurements were made.
- b. The "daily maximum" discharge means the total discharge by weight during any calendar day.
- c. A "discrete" sample means any individual sample collected in less than 15 minutes.
- d. A "composite sample" means a combination of no fewer than eight individual samples obtained at equal time intervals over the production period of the day of sampling. The volume of each individual sample shall be proportional to the discharge flow rate at the time of sampling.
- e. "Seafood" means the raw material, including freshwater and saltwater fish and shellfish, to be processed, in the form in which it is received at the processing plant.

6. Additional Monitoring by the Permittee

If the permittee monitors any pollutant more frequently than required by this permit, using test procedures approved under 40 CFR Part 136 or as specified in the permit, the results of such monitoring shall be included in the calculation and reporting of the data submitted in the DMR.

7. Averaging of Measurements

Calculations for all limitations which require averaging of measurements shall utilize an arithmetic mean unless otherwise specified by the Regional Administrator in the permit.

8. Intermittent Discharge Monitoring

If the discharge is intermittent rather than continuous, then on the first day of each such intermittent discharge, the permittee shall monitor and record data for all the characteristics listed in the monitoring requirements, after which the frequencies of analysis listed in the monitoring requirements shall apply for the duration of each such intermittent discharge. In no event shall the permittee be required to monitor and record data more often than twice the frequencies listed in the monitoring requirements.

9. Monitoring Modification

Monitoring, analytical, and reporting requirements may be modified by the Regional Administrator upon due notice.

10. Retention of Records

The permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit for a period of at least three (3) years from the date of the sample, measurement, or report. This period may be extended by request of the Regional Administrator at any time.

11. Records Content

Records of monitoring information shall include:

- a. The date, place, and time of sampling or measurements;
- b. The individual(s) who performed the sampling or measurements;
- c. The date(s) analyses were performed;
- d. The individual(s) who performed the analyses;
- e. The analytical techniques or methods used; and
- f. The results of such analyses.

12. Inspection and Entry

The permittee shall allow the Regional Administrator, or the Executive Secretary, or an authorized representative, upon the presentation of credentials and other documents as may be required by law, to:

- a. Enter upon the permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c. Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit; and
- d. Sample or monitor at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by the Act, any substances or parameters at any location. If samples are taken, the permittee shall be given split samples upon request.

D. REPORTING REQUIREMENTS

1. Anticipated Noncompliance

The permittee shall give advance notice to the Regional Administrator of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements.

2. Compliance Reports

Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this permit shall be submitted no later than 14 days following each schedule date.

3. Monitoring Reports

Monitoring results shall be reported at the intervals specified in Part I.C.4. of this permit.

4. Twenty-Four Hour Reporting of Noncompliance

The permittee shall report any noncompliance which may endanger health or the environment. Any information shall be provided orally within 24 hours from the time the permittee becomes aware of the circumstances. A written submission shall also be provided within 5 days of the time the permittee becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the period of noncompliance, including dates and times, and, if the noncompliance has not been corrected, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent reoccurrence of the noncompliance.

The following shall be included as information which must be reported within 24 hours:

- a. Any unanticipated bypass which exceeds any effluent limitation in the permit;
- b. Any upset which exceeds any effluent limitation in the permit; and
- c. Violation of a maximum daily discharge limitation for any toxic pollutant or hazardous substance, or any pollutant specifically identified as the method to control a toxic pollutant or hazardous substance, listed as such by the Regional Administrator in the permit to be reported within 24 hours.

5. Other Noncompliance

The permittee shall report all instances of noncompliance not reported under Part I.D.4. at the time monitoring reports are submitted. The reports shall contain the information listed in Part I.D.4.

6. Signatory Requirements

a. Applications. All permit applications shall be signed as follows:

- (1) For a corporation: by a responsible corporate officer.
For the purposes of this section, a responsible corporate officer means (a) a president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy- or decision-making functions for the corporation, or (b) the manager of one or more manufacturing, production, or operating facilities employing more than 250 persons or having gross annual sales or expenditures exceeding \$25 million (in second-quarter 1980 dollars), if authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures.
- (2) For a partnership or sole proprietorship: by a general partner or proprietor, respectively; or
- (3) For a municipality, State, Federal, or other public agency: by either a principal executive officer or ranking elected official. For purposes of this section, a principal executive officer of a Federal agency includes (a) the chief executive officer of the agency, or (b) a senior executive officer having responsibility for the overall operations of a principal geographic unit of the agency (e.g., Regional Administrators of EPA).

b. Reports. All reports required by permits and other information requested by the Regional Administrator shall be signed by a person described in paragraph a. of this section, or by a duly authorized representative of that person. A person is a duly authorized representative only if:

- (1) The authorization is made in writing by a person described in paragraph a. of this section;
- (2) The authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility or activity, such as the position of plant manager, operator of a well or a well field, superintendent, or position of equivalent responsibility. (A duly authorized representative may thus be either a named individual or any individual occupying a named position.) and

(3) The written authorization is submitted to the Regional Administrator.

- c. Changes to authorization. If an authorization under paragraph b. of this section is no longer accurate because a different individual or position has responsibility for the overall operation of the facility, a new authorization satisfying the requirements of paragraph b. of this section must be submitted to the Regional Administrator prior to or together with any reports, information, or applications to be signed by an authorized representative.
- d. Certification. Any person signing a document under paragraphs a. or b. of this section shall make the following certification:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

7. Duty to Provide Information

The permittee shall furnish to the Regional Administrator, within a reasonable time, any information which the Regional Administrator may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit or to determine compliance with this permit. The permittee shall also furnish to the Regional Administrator upon request, copies of records required to be kept by this permit.

8. Availability of Reports

Except for data determined to be confidential under 40 CFR Part 2, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the offices of the Regional Administrator. As required by the Act, permit applications, permits, and effluent data shall not be considered confidential.

9. Penalties for Falsification of Reports

The Act provides that any person who knowingly makes any false statement, representation, or certification in any record or other document submitted or required to be maintained under

this permit, including monitoring reports or reports of compliance or noncompliance shall, upon conviction, be punished by a fine of not more than \$10,000 per violation, or by imprisonment for not more than 6 months per violation, or by both.

10. Planned Changes

The permittee shall give notice to the Director as soon as possible of any planned physical alterations or additions to the permitted facility. Notice is required only when:

- a. The alteration or addition to the permitted facility may meet one of the criteria for determining whether a facility is a new source in 40 CFR § 122.29 (b); or
- b. The alteration or addition could significantly change the nature or increase the quantity of pollutants discharged. This notification applies to pollutants which are subject neither to effluent limitations in the permit, nor to notification requirements under 40 CFR § 122.42 (a)(1).

PART II

A. OPERATION AND MAINTENANCE OF POLLUTION CONTROLS

1. Proper Operation and Maintenance

The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures. This provision requires the operation of backup or auxiliary facilities or similar systems which are installed by the permittee only when the operation is necessary to achieve compliance with the conditions of the permit.

2. Need to Halt or Reduce Not a Defense

It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

3. Bypass of Treatment Facilities

a. Definitions

- (1) "Bypass" means the intentional diversion of waste streams from any portion of a treatment facility.
- (2) "Severe property damage" means substantial physical damage to property, damage to the treatment facilities which causes them to become inoperable, or substantial and permanent loss of natural resources which are reasonably expected to occur in the absence of a bypass. Severe property damage does not mean economic loss caused by delays in production.

b. Bypass not exceeding limitations

The permittees may allow any bypass to occur which does not cause effluent limitations to be exceeded, but only if it also is for essential maintenance to assure efficient operation. These bypasses are not subject to the provisions of paragraphs c. and d. of this section.

c. Notice

- (1) Anticipated bypass. If the permittee knows in advance of the need for a bypass, he shall submit prior notice, if possible, at least 10 days before the date of the bypass.
- (2) Unanticipated bypass. The permittee shall submit notice of an unanticipated bypass as required in Part I.D.4. (24-hour notice).

d. Prohibition of bypass

- (1) Bypass is prohibited, and the Regional Administrator may take enforcement action against the permittee for bypass, unless:
 - (a) Bypass was unavoidable to prevent loss of life, personal injury, or severe property damage;
 - (b) There were no feasible alternatives to the bypass, such as the use of auxiliary treatment facilities, retention of untreated wastes, or maintenance during normal periods of equipment downtime. This condition is not satisfied if adequate backup equipment should have been installed in the exercise of reasonable engineering judgment to prevent a bypass which occurred during normal periods of equipment downtime or preventive maintenance; and
 - (c) The permittee submitted notices as required under paragraph c. of this section.
- (2) The Regional Administrator may approve an anticipated bypass, after considering its adverse effects, if he determines that it will meet the three conditions listed above in paragraph d.(1) of this section.

4. Upset Conditions

a. Definition

"Upset" means an exceptional incident in which there is unintentional and temporary noncompliance with technology-based permit effluent limitations because of factors beyond the reasonable control of the permittee. An upset does not include noncompliance to the extent caused by operational error, improperly designed treatment facilities, inadequate treatment facilities, lack of preventive maintenance, or careless or improper operation.

b. Effect of an upset

An upset constitutes an affirmative defense to an action brought for noncompliance with such technology-based permit effluent Limitations if the requirements of paragraph c of this section are met. No determination made during administrative review of claims that noncompliance was caused by an upset, and before an action for noncompliance, is final administrative action subject to judicial review.

c. Conditions necessary for a demonstration of upset

A permittee who wishes to establish the affirmative defense of upset shall demonstrate, through properly signed, contemporaneous operating logs, or other relevant evidence that:

- (1) An upset occurred and that the permittee can identify the the specific cause(s) of the upset;
- (2) The permitted facility was at the time being properly operated;
- (3) The permittee submitted notice of the upset as required in Part I.D.4. (24-hour notice); and
- (4) The permittee complied with any remedial measures required under Part II.B.4. (duty to mitigate).

d. Burden of proof

In any enforcement proceeding the permittee seeking to establish the occurrence of an upset has the burden of proof.

5. Removed Substances

Solids, sludges, filter backwash, or other pollutants removed in the course of treatment or control of wastewaters shall be disposed of in a manner such as to prevent any pollutant from such materials from entering navigable waters.

B. GENERAL CONDITIONS

1. Duty to Comply

The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or denial of a permit renewal application.

2. Duty to Comply with Toxic Effluent Standards

The permittee shall comply with effluent standards or prohibitions established under section 307(a) of the Act for toxic pollutants within the time provided in the regulations that establish these standards or prohibitions, even if the permit has not yet been modified to incorporate the requirement.

3. Penalties for Violation of Permit Conditions

The Act provides that any person who violates a permit condition implementing sections 301, 302, 306, 307, 308, 318, or 405 of the Act is subject to a civil penalty not to exceed \$10,000 per day of such violation. Any person who willfully or negligently violates permit conditions implementing sections 301, 302, 306, 307, or 308 of the Act is subject to a fine of not less than \$2,500 nor more than \$25,000 per day of violation, or by imprisonment for not more than one year, or both.

4. Duty to Mitigate

The permittee shall take all reasonable steps to minimize or prevent any discharge in violation of this permit which has a reasonable likelihood of adversely affecting human health or the environment.

5. Permit Actions

This permit may be modified, revoked and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or notification of planned changes and anticipated noncompliance, does not stay any permit condition.

6. Toxic Pollutants

Notwithstanding Part II.B.5. above, if a toxic effluent standard or prohibition (including any schedule of compliance specified in such effluent standard or prohibition) is established under Section 307(a) of the Act for a toxic pollutant which is present in the discharge and such standard or prohibition is more stringent than any limitation for such pollutant in this permit, this permit shall be revoked and reissued or modified in accordance with the toxic effluent standard or prohibition and the permittee so notified.

7. Transfers

This permit is not transferable to any person except after notice to the Regional Administrator. The Regional Administrator may require modification or revocation and reissuance of the permit to change the name of the permittee and incorporate such other requirements as may be necessary under the Act.

8. Transfer of Ownership or Control

In the event of any change in control or ownership of facilities from which the authorized discharges emanate, the permittee shall notify the succeeding owner or controller of the existence of this permit by letter, a copy of which shall be forwarded to the Regional Administrator.

9. Civil and Criminal Liability

Except as provided in permit conditions on "Bypasses" (Part II.A.3.) and "Upsets" (Part II.A.4.), nothing in this permit shall be construed to relieve the permittee from civil or criminal penalties for noncompliance.

10. Oil and Hazardous Substance Liability

Nothing in this permit shall be construed to preclude the institution of any legal action or relieve the permittee from any responsibilities, liabilities, or penalties to which the permittee is or may be subject under section 311 of the Act.

11. State Laws

Nothing in this permit shall be construed to preclude the institution of any legal action or relieve the operator from any responsibilities, liabilities, or penalties established pursuant to any applicable State law or regulation under authority preserved by Section 510 of the Act.

12. Property Rights

The issuance of this permit does not convey any property rights of any sort, or any exclusive privileges, nor does it authorize any injury to private property, or any invasion of personal rights, nor any infringement of Federal, State, or local laws or regulations.

13. Severability

The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

PART III

A. REAPPLICATION

If the permittee desires to continue an activity regulated by this permit after the expiration of the permit, the permittee must apply for and obtain a new permit.

B. NOTIFICATION REQUIREMENTS

The permittee must notify the Regional Administrator as soon as they know or have reason to believe:

(1) That any activity has occurred or will occur which would result in the discharge of any toxic pollutant which is not limited in the permit, if that discharge will exceed the highest of the following "notification levels":

(a) One hundred micrograms per liter (100 ug/l);

(b) Two hundred micrograms per liter (200 ug/l) for acrolein and acrylonitrile; five hundred micrograms per liter (500 ug/l) for 2,4-dinitrophenol and for 2-methyl-4,6-dinitrophenol; and one milligram per liter (1 mg/l) for antimony;

(c) Five (5) times the maximum concentration value reported for that pollutant in the permit application in accordance with §122.21 (g)(9).

C. REOPENER

After notice and opportunity for public comment, this permit may be modified, suspended, or revoked in whole or in part during its term for cause including, but not limited to, the following:

1. Violation of any terms or conditions of this permit;
2. The Government of American Samoa granting a zone of mixing;
3. The results of the study, alternative, and schedule required in Part I; or
4. Revisions to the American Samoa Water Quality Standards, including, but not limited to, revisions to the methodology used to determine compliance with water quality standards.

RESPONSE TO PUBLIC COMMENTS

Tuna Cannery Wastewater NPDES Permit No. AS0000027
Samoa Packing Company

Public notice of EPA's tentative decision to issue this permit was provided in the Samoa News on August 29, 1986. One letter commenting on the proposed permit was received by EPA during the public comment period which closed on October 10, 1986. The comments in this letter were reviewed by EPA and considered in the formulation of the final determination regarding the proposed permit. Our response to the comments which were received is as follows:

Comment: The discharger requested that the compliance schedule be adjusted to allow for more receiving water monitoring after the segregation and barging of the high strength wastes.

Response: Compliance schedules are granted when necessary to allow compliance as soon as possible with requirements, such as water quality standards, which are issued or revised after recommencement of the discharge. The ASG adopted water quality standards in 1977 which were reviewed and approved in 1981 and in 1984, while the permit became effective in 1978. EPA recognizes that the discharger may need additional time with which to come into compliance with water quality standards. EPA believes, though, that four years is sufficient time to achieve compliance with water quality standards. Accordingly, the permit has been changed to require compliance with water quality standards in four, instead of three, years.

In addition, six months after completion of segregation and barging of the high strength wastes, the discharger must submit a report which evaluates the alternatives for achieving compliance with water quality standards. Upon submission of the report and schedule, EPA will reopen and modify the permit as necessary.

The compliance schedule has also been adjusted to allow the discharger sufficient time to come into compliance with water quality standards. The discharger will now be required to comply with water quality standards at four, instead of three, years.

Comment: The ASG requested that the canneries be required to conduct a current monitoring program as part of the alternative selection process required by Part I.B. of the permit.

Response: Pursuant to 40 CFR 124.53 and 40 CFR 124.54, the ASG, in its certification of this permit, included the above condition necessary to certify that the terms and conditions of this permit will assure compliance with American Samoa water quality standards. In addition to the steps outlined in Part I.B. of the permit, a current monitoring program is necessary to evaluate alternate discharge locations. The ASG needs this information before it can approve any alternate discharge location. Accordingly, the permit has been changed to add this requirement.

RESPONSE TO PUBLIC COMMENTS

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

215 Fremont Street

San Francisco, Ca. 94105

23 SEP 1986

In Reply
Refer to: W-5-1

Dear Interested Party:

The public notice comment period for our proposed action on the applications for National Pollutant Discharge Elimination System (NPDES) permits for the following dischargers

Star-Kist Samoa, Inc.
P.O. Box 368
Pago Pago, American Samoa 96799
NPDES Permit No. AS0000019

and

Samoa Packing Company, Inc.
P.O. Box 957
Pago Pago, American Samoa 96799
NPDES Permit No. AS0000027

has been extended. The public notice comment period will now be open from August 29, 1986 to October 10, 1986. Comments on the proposed actions, or a request for a public hearing pursuant to 40 CFR 124.12, must be submitted to this office no later than October 10, 1986. Comments or requests for public hearings should be sent to the above address, attention: Patrick Chan, Permits Record Controller (W-5-1).

If the Regional Administrator finds a significant degree of public interest exists with respect to the proposed permits, a public hearing shall be held. If no hearing is held, we expect to forward the permit containing the final determination of the Regional Administrator shortly after the close of the comment period.

If you have any questions regarding the technical nature of the draft permit, please call Madonna Narvaez at (415) 974-7427.

0296

If you have any questions regarding the administrative procedures of the permit issuance process, please call Danny Collier at (415) 974-7432.

Sincerely,


Frank M. Covington
Director, Water Management Division

cc: Pati Faiai, Environmental Quality Commission
U.S. Army Corps of Engineers, HI
U.S. Dept. of Interior, HI
U.S. Fish and Wildlife Service, HI
U.S. National Marine Fisheries Service, HI
U.S. Navy, HI



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
215 Fremont Street
San Francisco, Ca. 94105

In Reply
Refer to: W-5-1

23 SEP 1986

Frank Hackmann
Associate Counsel (T-9)
Ralston Purina Company
Checkerboard Square
St. Louis, Missouri 63164

Dear Mr. Hackmann:

The public notice comment period for our proposed action on your application for a National Pollutant Discharge Elimination System (NPDES) permit for

Samoa Packing Company, Inc.
P.O. Box 957
Pago Pago, American Samoa 96799
NPDES Permit No. AS0000027

has been extended. The public notice comment period will now be open from August 29, 1986 to October 10, 1986. Comments on the proposed action, or a request for a public hearing pursuant to 40 CFR 124.12, must be submitted to this office no later than October 10, 1986. Comments or requests for public hearings should be sent to the above address, attention: Patrick Chan, Permits Record Controller (W-5-1).

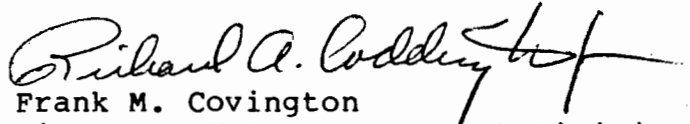
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0297

If you have any questions regarding the administrative procedures of the permit issuance process, please call Danny Collier at (415) 974-7432.

Sincerely,


Frank M. Covington
Director, Water Management Division

JOINT NOTICE OF PROPOSED ACTION

BY THE

U.S. ENVIRONMENTAL PROTECTION AGENCY
Region 9
215 Fremont Street
San Francisco, CA 94105

ENVIRONMENTAL QUALITY COMMISSION
American Samoa Government
Pago Pago, American Samoa 96799

Contact Person: Danny Collier (W-1-1)
Telephone: (415) 974-7432

Contact Person: Pati Faiai

On Applications for a National Pollutant
Discharge Elimination System Permits to
Discharge Pollutants to Waters of the
United States

On Applications for Certification for
Compliance with Applicable Effluent
Limitations and Appropriate Requirements
of Territory Law

Public Notice No. AS-86-1-W

The Environmental Protection Agency (EPA), Region 9, San Francisco, California and the American Samoa Environmental Quality Commission, Pago Pago, American Samoa are jointly issuing the following notice of proposed action under the Clean Water Act.

The Environmental Protection Agency, San Francisco, California has received complete applications for National Pollution Discharge Elimination System (NPDES) permits and has prepared tentative determinations regarding the permits.

On the basis of preliminary review of the requirements of the Clean Water Act as amended, and implementing regulations, the Regional Administrator, Environmental Protection Agency, Region 9, proposes to issue NPDES permits to discharge to the following applicants, subject to certain effluent limitations and special conditions:

Star-Kist Samoa, Inc.
P.O. Box 368
Pago Pago, American Samoa 96799
NPDES Permit No. AS0000019

and
Samoa Packing Company, Inc.
P.O. Box 957
Pago Pago, American Samoa 96799
NPDES Permit No. AS0000027

Star-Kist Samoa and Samoa Packing Company operate tuna canneries on Tutuila Island, American Samoa. The canneries receive whole tuna which is processed into canned tuna and dried fish meal. Waste streams from these canneries consist mainly of fish waste, fresh water, and sea water which are treated by the Dissolved Air Flotation (DAF) process. The process waste streams from both canneries are discharged into Pago Pago Harbor.

Under proposed permit conditions, both canneries are required to meet proposed interim and final effluent limits for temperature, suspended solids, oil and grease, pH, nitrogen and phosphorus.

The proposed permits require that both canneries shall meet stringent final effluent limits that are based on American Samoa Water Quality Standards for Pago Pago Harbor.

The ADMINISTRATIVE RECORDS for the DRAFT PERMITS, which includes the APPLICATIONS, DRAFT PERMITS, FACT SHEETS, and all data sent by the applicants for the PERMITS, are available for public inspection. The ADMINISTRATIVE RECORDS may be viewed Monday through Friday from 9:00 am until 4:00 pm at the EPA address below. A copy of these documents may be obtained by calling Patrick Chan, Permit Records Controller at (415) 974-9526 or by writing to:

U.S. Environmental Protection Agency, Region 9
Attn: Patrick Chan, PRC (W-5-1)
215 Fremont Street
San Francisco, CA 94105

All comments upon or objections to the DRAFT PERMITS and requests for a PUBLIC HEARING, pursuant to 40 CFR 124.12, must be sent or delivered in writing to Patrick Chan at the address shown above within 30 days of the date of this notice. An extension of the 30 day comment period may be granted if the request for an extension adequately explains why more time is required to prepare comments.

A Copy of the applications, draft permits and fact sheets is also available for public review Monday through Friday from 8:00 am to 4:00 pm at the following office:

Environmental Quality Commission
American Samoa Government
Pago Pago, American Samoa 96799

Contact Person: Pati Faiai

The Environmental Quality Commission is reviewing the DRAFT PERMITS and may:

1. certify the DRAFT PERMITS without comment; or
2. certify the DRAFT PERMITS and impose conditions more stringent than those contained therein; or
3. deny the certification of the DRAFT PERMITS.

Requests for a PUBLIC HEARING must state the nature of the issues proposed to be raised in the hearing. Pursuant to 40 CFR 124.12, the Regional Administrator shall hold a PUBLIC HEARING if she finds, on the basis of requests, a significant degree of public interest in the DRAFT PERMITS. If the Regional Administrator decides to hold a public hearing, a public notice of the date, time and place of the hearing will be made at least 30 days prior to the hearing. Any person may provide written or oral statements and data pertaining to the DRAFT PERMITS at the public hearing.

If the DRAFT PERMITS become final, and there are no appeals, discharge from and operation of the identified facilities may proceed or continue, subject to the conditions of the permits and other applicable permits and legal requirements.

A final decision to set the conditions and to issue the FINAL PERMITS, or to deny the APPLICATIONS for the permits, shall be made after all comments have been considered. Notice of the final decision for the permits shall be sent to each person who has sent or delivered written comments or requested notice of the final permits decision. The decision for the permits will become effective 30 days from the date of issuance unless:

1. a later effective date is specified in the decision; or
2. an evidentiary hearing is requested pursuant to 40 CFR 124.74. Any person may send or deliver, in writing, a request for an evidentiary hearing. Requests for an evidentiary hearing must state each legal or factual question alleged to be at issue, and its relevance to the permit decision. If the request is sent or delivered by a person other than the applicant, the person will simultaneously send a copy of the request to the applicant. A request for an evidentiary hearing must be sent or delivered to Patrick Chan at the address shown above within 33 days following the mailing of the final decision. If an evidentiary hearing is granted, applicable provisions of the permits will be stayed pending the outcome of the hearing; or
3. there are no comments requesting a change to the DRAFT PERMITS, in which case the final decision for the permits shall become effective immediately upon issuance.

Please bring the foregoing to the attention of all persons you know would be interested in this matter.

August 28, 1986

JOINT NOTICE OF PROPOSED ACTION

by the

U.S. Environmental Protection Agency
Region 9
215 Fremont Street
San Francisco, CA 94105

Environmental Quality Commission
American Samoa Government
Pago Pago, American Samoa 96799

Contact Person: Danny Collier (W-1-1)
Telephone: (415) 974-7432

Contact Person: Pati Faiai

On Applications for National Pollutant
Discharge Elimination System Permits to
Discharge Pollutants to Waters of the
United States

On Applications for Certification for
Compliance with Applicable Effluent
Limitations and Appropriate Requirements
of Territory Law

Public Notice No. GU-86-4-W

28 AUG 1986

The Environmental Protection Agency (EPA), Region 9, San Francisco, California and the American Samoa Environmental Quality Commission, Pago Pago, American Samoa are jointly issuing the following notice of proposed action under the Clean Water Act.

The Environmental Protection Agency, San Francisco, California, has received complete applications for National Pollution Discharge Elimination System (NPDES) permits and has prepared tentative determinations regarding the permits.

On the basis of preliminary review of the requirements of the Clean Water Act as amended, and implementing regulations, the Regional Administrator, Environmental Protection Agency, Region 9, proposes to issue NPDES permits to discharge to the following applicants, subject to certain effluent limitations and special conditions:

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Star-Kist Samoa and Samoa Packing Company operate tuna canneries on Tutuila Island, American Samoa. The canneries receive whole tuna which is processed into canned tuna and dried fish meal. Waste streams from these canneries consist mainly of fish waste, fresh water, and sea water which are treated by the Dissolved Air Flotation (DAF) process. The process waste streams from both canneries are discharged into Pago Pago Harbor.

Under proposed permit conditions, both canneries are required to meet proposed interim and final effluent limits for temperature, suspended solids, oil and grease, pH, nitrogen and phosphorus.

0370

The proposed permits require that both canneries shall meet stringent final effluent limits that are based on American Samoa Water Quality Standards for Pago Pago Harbor.

The ADMINISTRATIVE RECORDS for the DRAFT PERMITS, which includes the APPLICATIONS, DRAFT PERMITS, FACT SHEETS, and all data sent by the applicants for the PERMITS, are available for public inspection. The ADMINISTRATIVE RECORDS may be viewed Monday through Friday from 9:00 A.M. until 4:00 P.M. at the EPA address below. A copy of these documents may be obtained by calling Patrick Chan, Permit Records Controller at (415) 974-9526 or by writing to:

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A Copy of the applications, draft permits and fact sheets is also available for public review Monday through Friday from 8:00 A.M. to 4:00 P.M. at the following office:

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The Environmental Quality Commission is reviewing the DRAFT PERMITS and may:

1. certify the DRAFT PERMITS without comment; or
2. certify the DRAFT PERMITS and impose conditions more stringent than those contained therein; or
3. deny the certification of the DRAFT PERMITS.

Requests for a PUBLIC HEARING must state the nature of the issues proposed to be raised in the hearing. Pursuant to 40 CFR 124.12, the Regional Administrator shall hold a PUBLIC HEARING if she finds, on the basis of requests, a significant degree of public interest in the DRAFT PERMITS. If the Regional Administrator decides to hold a public hearing, a public notice of the date, time and place of the hearing will be made at least 30 days prior to the hearing. Any person may provide written or oral statements and data pertaining to the DRAFT PERMITS at the public hearing.

If the DRAFT PERMITS become final, and there are no appeals, discharge from and operation of the identified facilities may proceed or continue, subject to the conditions of the permits and other applicable permits and legal requirements.

A final decision to set the conditions and to issue the FINAL PERMITS, or to deny the APPLICATIONS for the permits, shall be made after all comments have been considered. Notice of the final decision for the permits shall be sent to each person who has sent or delivered written comments or requested notice of the final permit decision. The decision for the permits will become effective 30 days from the date of issuance unless:

1. a later effective date is specified in the decision; or
2. an evidentiary hearing is requested pursuant to 40 CFR 124.74. Any person may send or deliver, in writing, a request for an evidentiary hearing. Requests for an evidentiary hearing must state each legal or factual question alleged to be at issue, and its relevance to the permit decision. If the request is sent or delivered by a person other than the applicant, the person will simultaneously send a copy of the request to the applicant. A request for an evidentiary hearing must be sent or delivered to Patrick Chan at the address shown above within 33 days following the mailing of the final decision. If an evidentiary hearing is granted, applicable provisions of the permits will be stayed pending the outcome of the hearing; or
3. there are no comments requesting a change to the DRAFT PERMITS, in which case the final decision for the permits shall become effective immediately upon issuance.

Please bring the foregoing to the attention of all persons you know would be interested in this matter.

FACT SHEET

NPDES permit AS0000027 Samoa Packing Company

Description of Discharge

The Samoa Packing Co. tuna cannery is located on Tutuila Island, American Samoa. Process discharges from the cannery enter Pago Pago Harbor at 14° 16' 26.5" South latitude and 170° 41' 8" West longitude. The cannery receives whole tuna which is processed into canned tuna and dried fish meal. Waste streams from this operation consist mainly of fish waste, fresh water, and sea water which are treated by the Dissolved Air Floation (DAF) process. The DAF sludge is barged to sea for disposal. Approximately 320 tons of fish are processed per day. The resulting discharge is 0.72 MGD.

BCT Determination

The Clean Water Act (the Act) requires compliance with effluent limitations based on the application of Best Conventional Pollutant Control Technology (BCT) no later than July 1, 1984. On July 9, 1986, EPA published final effluent guidelines in the Federal Register which set BCT limits for tuna processing equal to Best Practicable Control Technology (BPT).

Effluent Limitations

The effluent limits set forth in this permit are based on BCT as outlined above. In addition, the permit imposes more stringent final and interim limits in order to bring the discharge into compliance with the Pago Pago Harbor water quality standards. The BCT limits are based on effluent guidelines for tuna processing found at 40 CFR §408 Subpart N. These guidelines contain limits for total suspended solids (TSS), oil and grease (O&G), and pH. The BCT effluent limits must be met immediately. The interim limits may be met by eliminating the high strength press and precooker waste streams from the effluent. These interim limits for nitrogen, and

phosphorus are based on the increased pollutant control available with waste stream segregation. The interim limits must be met within 12 months. Final limits for total nitrogen and total phosphorus are imposed after three years to ensure that these pollutants do not cause violations of water quality standards in the receiving waters.

Calculation of Effluent Limits

Effluent limitations for the process waste discharge were calculated based on the total flow rates reported in the permit application:

<u>Maximum</u>	<u>Monthly Average</u>
0.72 MGD	0.44 MGD

Technology-Based Limits

BCT limits for TSS and O&G are based on the production rate applied for by the permittee, and the production-based factors promulgated in the BPT effluent guidelines for the tuna processing point source category. These factors are given as Discharge Limitations in the permit along with mass limitations based on an estimated production rate of 320 tons per day. These BCT limits must be met immediately.

Final Limits Based on Water Quality Standards

The Act also requires that the discharge comply with effluent limitations based on any water quality standards applicable to the receiving waters. In 1981, the American Samoa Government adopted, and EPA approved, Water Quality Standards for American Samoa which contain numerical limits for pollutant concentrations allowed in the waters of Pago Pago Harbor. Water quality limitations for nitrogen, phosphorus, and temperature are shown in the following table:

<u>Parameter</u>	<u>Median not to exceed given value</u>	<u>Not to exceed given value 10% of the time</u>	<u>Not to exceed given value 2% of the time</u>
Total N (mg/1)	0.20	0.35	0.50
Total P (mg/1)	0.03	0.06	0.09

Temperature shall not exceed 85° F at any time.

The pH range shall be 6.5 to 8.6 and be within 0.2 pH units of that which would occur naturally.

These limits must be met within three years. Part III.C. of the permit allows the permit to be reopened and modified to include new limits if the American Samoa water quality standards are revised or if the American Samoa Government grants the permittee a zone of mixing.

Interim Limits

Interim limits are imposed to ensure that progress is made towards compliance with water quality standards. These interim limits may be met by the use of DAF treatment and segregation of high strength press and precooker waters from the plant effluent for disposal at sea. The "Joint Study of Fish Cannery Wastewater Effluent Loading Reduction at Pago Pago Harbor, American Samoa" prepared by CH2M Hill in 1984 discusses this treatment method in depth and strongly suggests its implementation. It is a simple method which would significantly improve the water quality of the harbor. Implementation of this technology is economically reasonable, and results in a discharge similar to that of tuna processing facilities which employ a solubles plant to recover oils from the high strength tuna processing waters. This level of treatment can be accomplished with simple in-plant control modifications. Implementation requires modifications to plant waste water conveyances, which will remove the press and precooker waters from the DAF influent, construction of new tankage to store this flow, and use of a waste transport vessel which has adequate capacity to carry the increased waste volume. These limits must be met within 12 months of issuance of the permit.

Calculation of Interim Limits

The interim nitrogen limits are based on the elimination of press and precooker nitrogen loads from the discharge. The limits are calculated as the reported nitrogen effluent load less the nitrogen reduction predicted as shown below:

<u>Flow</u>	<u>Effluent N Load (lbs/day)³</u>	<u>N Fraction Contributed by Press & Precooker¹</u>	<u>Press & Precooker N Load (lbs/day)</u>	<u>DAF Treatment Efficiency²</u>	<u>Effluent N Reduction (lbs/day)</u>
Daily Maximum	2,822.2	0.60	1,693	40%	1,016
Monthly Average	1,276	0.60	766	40%	459

The interim phosphorus limits are calculated similarly:

<u>Flow</u>	<u>Effluent P Load (lbs/day)³</u>	<u>P Fraction Contributed by Press & Precooker¹</u>	<u>Press & Precooker P Load (lbs/day)</u>	<u>DAF Treatment Efficiency²</u>	<u>Effluent P Reduction (lbs/day)</u>
Daily Maximum	163.0	0.60	97.8	40%	58.7
Monthly Average	51.8	0.60	31.1	40%	18.6

(Since DAF treatment removes 40% of all nitrogen and phosphorus from the waste water, we can expect that a given reduction of these pollutants to the DAF units would result in an effluent reduction equal to 60% of the influent reduction. So, the incremental nutrient reduction in implementing waste stream segregation is 60% of the nutrient load of the two segregated streams.)

The limits are calculated as the reported effluent loads less the predicted reductions as shown below:

<u>Flow</u>	<u>Reported N load³</u>	<u>Predicted N reduction</u>	<u>Nitrogen Effluent limit</u>
Daily Maximum	2,822.2 lbs/day	1,016 lbs/day	1,800 lbs/day
Monthly Ave.	1,276 lbs/day	459 lbs/day	820 lbs/day

<u>Flow</u>	<u>Reported P load³</u>	<u>Predicted P reduction</u>	<u>Phosphorus Effluent limit</u>
Daily Maximum	163.0 lbs/day	58.7 lbs/day	100 lbs/day
Monthly Ave.	51.8 lbs/day	18.6 lbs/day	33 lbs/day

The interim limits must be met within 12 months of issuance of the permit.

Schedule of Compliance

The permit's schedule of compliance requires the permittee to bring the discharges into compliance with water quality standards within three years. Part I.B.1-3 describes the steps necessary to reach compliance within three years. The permit may be reopened and modified to include new effluent limits based on the results of Part I.B.3.

pH

The effluent limits for pH are based on water quality standards for Pago Pago Harbor. The 1% pH rule as specified in 40 CFR 401.17 can be applied to these limits since the applicant is required to monitor continuously for pH. These limits must be met immediately.

Additional Monitoring Requirements

Toxic substances and receiving water monitoring are required to document the effects on the beneficial uses of the receiving waters and to determine compliance with NPDES permit conditions.

The permit requires that the cannery effluent be sampled and reported twice yearly at Outfall Serial No. 001 for cadmium, chromium, lead, mercury and zinc, toxic substances as contained in Table III, Appendix D of 40 CFR 122. These could be present in the effluent as a result of the canmaking and can washing activities associated with tuna processing. Monitoring is required to ensure compliance with water quality standards.

Part I.A.6.b. of the permit also requires that the permittee continue to participate in the monitoring program in Pago Pago Harbor established by the American Samoan Government. This monitoring program is necessary to gather more data on Pago Pago Harbor, in order to document the effects of the discharges resulting from in-plant modifications on the receiving waters. Monitoring is required to determine compliance with the water quality standards.

Procedures for Decision Making

Notice of the Regional Administrator's intent to issue this permit is being sent to

as required by regulations at 40 CFR 124.10. Anyone wishing to comment on the proposed permit may do so in writing for a period of 30 days following the date of public notice. The comment period may be extended

at the discretion of the Regional Administrator. Comments should be addressed to:

Madonna Narvaez (W-5-1)
EPA Region 9
215 Fremont Street
San Francisco, CA 94105

Comments must be received by

Any interested party may request that a public hearing be held concerning this proposed action. Requests must be in writing and must be received during the 30 day comment period.

For further information, please contact Madonna Narvaez at (415) 974-7427.

0378

REFERENCES

1. CH2M Hill. 1984. Joint Study of Fish Cannery Wastewater Effluent Loading Reduction at Pago Pago Harbor, American Samoa. Page 3-19. November, 1984.
2. CH2M Hill. 1984. Joint Study of Fish Cannery Wastewater Effluent Loading Reduction at Pago Pago Harbor, American Samoa. Page 3-7. November, 1984.
3. Samoa Packing Company. Permit Application. September 27, 1984.

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FACT SHEET

NPDES permit AS0000027 Samoa Packing Company

Description of Discharge

The Samoa Packing Co. tuna cannery is located on Tutuila Island, American Samoa. Process discharges from the cannery enter Pago Pago Harbor at 14° 16' 26.5" South latitude and 170° 41' 8" West longitude. The cannery receives whole tuna which is processed into canned tuna and dried fish meal. Waste streams from this operation consist mainly of fish waste, fresh water, and sea water which are treated by the Dissolved Air Floation (DAF) process. The DAF sludge is barged to sea for disposal. Approximately 320 tons of fish are processed per day. The resulting discharge is 0.72 MGD.

BCT Determination

The Clean Water Act (the Act) requires compliance with effluent limitations based on the application of Best Conventional Pollutant Control Technology (BCT) no later than July 1, 1984. On July 9, 1986, EPA published final effluent guidelines in the Federal Register which set BCT limits for tuna processing equal to Best Practicable Control Technology (BPT).

Effluent Limitations

The effluent limits set forth in this permit are based on BCT as outlined above. In addition, the permit imposes more stringent final and interim limits in order to bring the discharge into compliance with the Pago Pago Harbor water quality standards. The BCT limits are based on effluent guidelines for tuna processing found at 40 CFR §408 Subpart N. These guidelines contain limits for total suspended solids (TSS), oil and grease (O&G), and pH. The BCT effluent limits must be met immediately. The interim limits may be met by eliminating the high strength press and precooker waste streams from the effluent. These interim limits for nitrogen, and

Please Concur

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Symbol	EW-5-1	W-5-1	W-5
Surname	M. N. N. N.	S. S. S. S.	S. S. S. S.
Date	8/13/86	8/14/86	8/14/86

WJ
Jmr
8/15/86

phosphorus are based on the increased pollutant control available with waste stream segregation. The interim limits must be met within 12 months. Final limits for total nitrogen and total phosphorus are imposed after three years to ensure that these pollutants do not cause violations of water quality standards in the receiving waters.

Calculation of Effluent Limits

Effluent limitations for the process waste discharge were calculated based on the total flow rates reported in the permit application:

<u>Maximum</u>	<u>Monthly Average</u>
0.72 MGD	0.44 MGD

Technology-Based Limits

BCT limits for TSS and O&G are based on the production rate applied for by the permittee, and the production-based factors promulgated in the BPT effluent guidelines for the tuna processing point source category. These factors are given as Discharge Limitations in the permit along with mass limitations based on an estimated production rate of 320 tons per day. These BCT limits must be met immediately.

Final Limits Based on Water Quality Standards

The Act also requires that the discharge comply with effluent limitations based on any water quality standards applicable to the receiving waters. In 1981, the American Samoa Government adopted, and EPA approved, Water Quality Standards for American Samoa which contain numerical limits for pollutant concentrations allowed in the waters of Pago Pago Harbor. Water quality limitations for nitrogen, phosphorus, and temperature are shown in the following table:

<u>Parameter</u>	<u>Median not to exceed given value</u>	<u>Not to exceed given value 10% of the time</u>	<u>Not to exceed given value 2% of the time</u>
Total N (mg/l)	0.20	0.35	0.50
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Temperature shall not exceed 85° F at any time.

The pH range shall be 6.5 to 8.6 and be within 0.2 pH units of that which would occur naturally.

These limits must be met within three years. Part III.C. of the permit allows the permit to be reopened and modified to include new limits if the American Samoa water quality standards are revised or if the American Samoa Government grants the permittee a zone of mixing.

Interim Limits

Interim limits are imposed to ensure that progress is made towards compliance with water quality standards. These interim limits may be met by the use of DAF treatment and segregation of high strength press and precooker waters from the plant effluent for disposal at sea. The "Joint Study of Fish Cannery Wastewater Effluent Loading Reduction at Pago Pago Harbor, American Samoa" prepared by CH2M Hill in 1984 discusses this treatment method in depth and strongly suggests its implementation. It is a simple method which would significantly improve the water quality of the harbor. Implementation of this technology is economically reasonable, and results in a discharge similar to that of tuna processing facilities which employ a solubles plant to recover oils from the high strength tuna processing waters. This level of treatment can be accomplished with simple in-plant control modifications. Implementation requires modifications to plant waste water conveyances, which will remove the press and precooker waters from the DAF influent, construction of new tankage to store this flow, and use of a waste transport vessel which has adequate capacity to carry the increased waste volume. These limits must be met within 12 months of issuance of the permit.

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<u>Flow</u>	<u>Effluent P Load (lbs/day)³</u>	<u>P Fraction Contributed by Press & Precooker¹</u>	<u>Press & Precooker P Load (lbs/day)</u>	<u>DAF Treatment Efficiency²</u>	<u>Effluent P Reduction (lbs/day)</u>
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The limits are calculated as the reported effluent loads less the predicted reductions as shown below:

<u>Flow</u>	<u>Reported N load³</u>	<u>Predicted N reduction</u>	<u>Nitrogen Effluent limit</u>
Daily Maximum	2,822.2 lbs/day	1,016 lbs/day	1,800 lbs/day
Monthly Ave.	1,276 lbs/day	459 lbs/day	820 lbs/day

<u>Flow</u>	<u>Reported P load³</u>	<u>Predicted P reduction</u>	<u>Phosphorus Effluent limit</u>
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Monthly Ave.	51.8 lbs/day	18.6 lbs/day	33 lbs/day

The interim limits must be met within 12 months of issuance of the permit.

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pH

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Part I.A.6.b. of the permit also requires that the permittee continue to participate in the monitoring program in Pago Pago Harbor established by the American Samoan Government. This monitoring program is necessary to gather more data on Pago Pago Harbor, in order to document the effects of the discharges resulting from in-plant modifications on the receiving waters. Monitoring is required to determine compliance with the water quality standards.

Procedures for Decision Making

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as required by regulations at 40 CFR 124.10. Anyone wishing to comment on the proposed permit may do so in writing for a period of 30 days following the date of public notice. The comment period may be extended

at the discretion of the Regional Administrator. Comments should be addressed to:

Madonna Narvaez (W-5-1)
EPA Region 9
215 Fremont Street
San Francisco, CA 94105

Comments must be received by

Any interested party may request that a public hearing be held concerning this proposed action. Requests must be in writing and must be received during the 30 day comment period.

For further information, please contact Madonna Narvaez at (415) 974-7427.

0384

REFERENCES

1. CH2M Hill. 1984. Joint Study of Fish Cannery Wastewater Effluent Loading Reduction at Pago Pago Harbor, American Samoa. Page 3-19. November, 1984.
2. CH2M Hill. 1984. Joint Study of Fish Cannery Wastewater Effluent Loading Reduction at Pago Pago Harbor, American Samoa. Page 3-7. November, 1984.
3. Samoa Packing Company. Permit Application. September 27, 1984.

0385

August 15, 1986

Samoa News Ltd.
P.O. Box 57
Pago Pago, American Samoa 96799
Attn: Legal Advertisement Section

Dear Sir:

Enclosed is a copy of a public notice of a proposed action
by the Environmental Protection Agency for:

Star-Kist Foods, Inc. and Samoa Packing Company, Inc.
National Pollutant Discharge Elimination
System (NPDES) Permits
Public Notice No. AS-86-1-W

Please schedule the enclosed public notice to appear in
the Classified Advertisement, Legal Notice section, of your
newspaper on Thursday, August 28, 1986 and for one time only.

The procedure for the request of payment is outlined in the
attached advertising order form. Upon issuance of the public
notice in your newspaper, please provide our office with two
affidavits or proofs of publication. The two affidavits and
a copy of the advertising order should be sent to the letterhead
address, attention: Financial Management Office, P-4.

If you have any questions in this matter please call me at
(415) 974-9526 or Danny Collier at (415) 974-7432.

Sincerely,



Patrick Chan
Permits and Pretreatment Section
Water Management Division

Enclosure

cc: Pati Faiai, Environmental Quality Commission

0386

Lyle Richmond
Chairman
Environmental Quality Commission
American Samoa Government
Pago Pago, A.S. 96799

4 FEB 1987

Dear Mr. Richmond:

We are now issuing the National Pollutant Discharge Elimination System (NPDES) permits for Star-Kist Samoa, Inc. and the Samoa Packing Company and would like to provide an explanation as to how the recommendations contained in your letter of October 20, 1986 were addressed in the permits. All seven of the recommendations have been incorporated with the exception of that concerning the length of time receiving water monitoring will be required. You recommended that such monitoring be conducted for three years following permit issuance, after which an alternative for meeting American Samoa Water Quality Standards (WQS) would be chosen within six months. The final permit requires one year of monitoring after permit issuance and selection of an alternative to achieve compliance with American Samoa WQS within two years.

There are several reasons why the permit requirements are structured in this way. First, compliance with American Samoa WQS must be achieved within the five year permit term as required under 40 CFR 122.47(a)(1). Secondly, it is our view that data obtained from three years of receiving water monitoring following permit issuance is not necessary to gauge the effects of high strength waste segregation. As you recall, the harbor responded relatively quickly when the Samoa Packing facility was not discharging. Past experience with estuarine systems suggests that the effects will be noted immediately or within several months when a major source of nutrient input is eliminated. As a great deal of study has already been devoted to this issue, we simply do not think that an additional three years of monitoring data is necessary. In any event, the permits have provisions for modification pending changes in American Samoa WQS and results of the study on alternatives to meet American Samoa WQS due six months after high waste segregation.

CONCURRENCES

SYMBOL	W-1-1	W-1-1				0325	
SURNAME	Wiegman	Cox					
DATE	2/4/87	2/4/87					

If you have any questions on the matters, please contact me at (415) 974-7431 or Susan Cox at (415) 974-7432.

Sincerely,

Original signed by:
NORMAN LOVELACE

Norman L. Lovelace
Chief
Office of Territorial Programs

cc: Pati Faiai, Executive Secretary, EQC

0326

18 DEC 1986

In Reply
Refer to: W-5-1

Frank H. Hackmann
Associate Counsel
Ralston Purina Company
Checkerboard Square
St. Louis, Missouri 63164

Re: Samoa Packing Company NPDES Permit No. AS0000027
Production Levels

Dear Mr. Hackmann:

We have reviewed your request to increase production from a nominal maximum of 320 tons/day to 375 tons/day.

Based on the data contained in discharge monitoring reports covering the period from March 1985 to August 1986, it appears that at no time did the production levels exceed the current permit limit of 320 tons/day. Since the increase you cited in your request has occurred since the close of the comment period on October 10, 1986, you will need to apply for a modification to the permit.

Once the final permit is issued, pursuant to 40 CFR 124.5, you may request a modification to the permit. The request must be in writing and must contain the facts and reasons supporting the request.

If you have any questions concerning this matter, please contact me at (415) 974-8110 or Madonna Narvaez, at (415) 974-7427.

Sincerely,

Original Signed by:
William H. Pierce
William H. Pierce
Chief, Permits and
Compliance Branch

0304

CONCURRENCES

SYMBOL	bc: Norm	Lovelace	W-5-1	W-5-1	W-5		
SURNAME	Narvaez		Narvaez	W-5-1	W-5		
DATE			12/09/86	12/10/86	12/10/86		

RECORD OF COMMUNICATION		<input type="checkbox"/> PHONE CALL <input checked="" type="checkbox"/> DISCUSSION <input type="checkbox"/> FIELD TRIP <input type="checkbox"/> CONFERENCE	
		<input type="checkbox"/> OTHER (SPECIFY) _____	
		(Record of item checked above)	
TO: <i>M. Narvaez</i>	FROM: <i>Roger Yates</i> <i>Mike Blum</i>	DATE: <i>12/14/86</i>	TIME: <i>PM.</i>
SUBJECT: <i>NPOES Permit Nos. AS0000019, AS0000027</i> <i>Canneries' outfall</i> <i>Estimated Construction Schedule for</i> <i>in Pago Pago Harbor (outer)</i>			
SUMMARY OF COMMUNICATION			
<p> <i>Asked for an estimate of time needed to design and construct an outfall for canneries into outer Pago Pago Harbor (total length 2.9 mi; 1500' into harbor; 18" diameter pipeline).</i> </p> <p> <i>Based on other construction in the area, subcontractors needed, etc., they estimated that 2 years would be a generous amount of time for construction (1½-2 yrs). At least 6 mos. would be necessary for design. The road would could progress at the same time as the outfall construction.</i> </p>			
CONCLUSIONS, ACTION TAKEN OR REQUIRED			
<p> <i>Will use this information to develop compliance schedule for canneries permits</i> </p>			
INFORMATION COPIES TO: <i>Files</i>			

0363

and because machine beheading is difficult. Peeling of the shrimp may be either by machine or by hand peeling, which produces shrimp that are more presentable than machine peeled shrimp. Two basic types of peelers are used in this industry, Johnson (PDI) peelers and Seafood Automatic Peelers. These machines can peel from 1,800 to 5,500 kg (4,000 to 12,000 lbs) per day. Breeding may be done by machine or manually by experienced persons. If hand-breeding is employed, the raw peeled shrimp are dipped in batter and then rolled in bread crumbs until the shrimp are coated. The coated shrimp are then boxed, weighed, sealed, and frozen. The same general process also is employed for mechanical breeding. Wastes from the mechanical system originate from holding tanks and from batter mixing tank overflow. Wash water also is generated by rebreading improperly breaded shrimp.

Breaded shrimp are sold as either "fantail" or "butterfly" shrimp. "Fantail" shrimp have the uropodal portion of the tail left and are split partway up the back; "butterfly" shrimp are split whole shrimp with the tail removed. Some plants sell portions of the processed shrimp as whole shrimp, in which case they are frozen, glazed, and packaged in either blast freezers or Individual Quick Frozen (IQF) freezers.

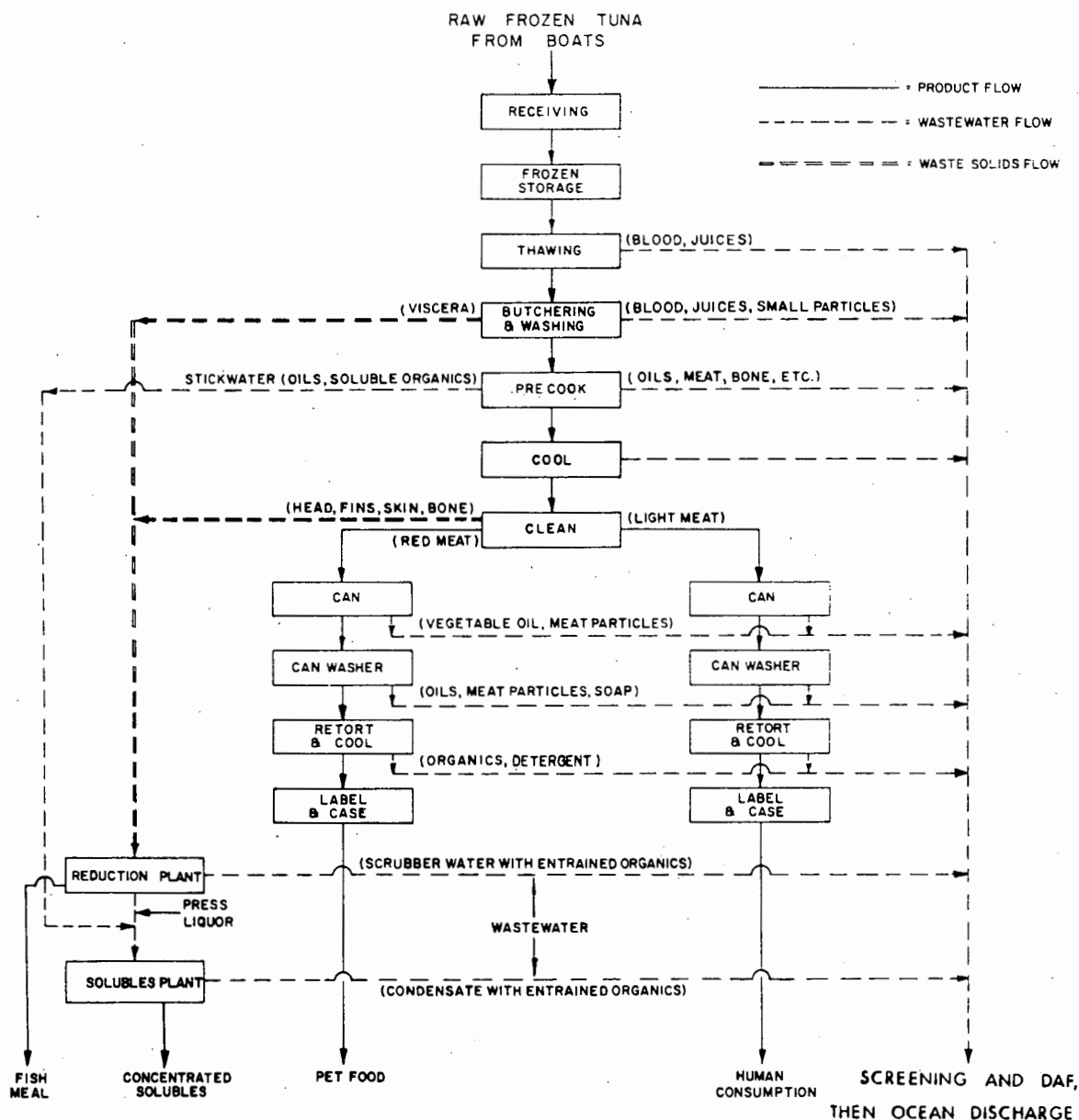
1.2.2.11 Tuna Processing (Figure 12)

The four tuna species of commercial importance are yellow fin (Neothunus macropodus), blue fin (Thunnus thynnus), skipjack (Katsuwonus pelamis), and albacore (Thunnus germon). In the industry, these species are classified as either white meat (exclusively albacore), or light meat (processed from the remaining three species).

Tuna processing is divided into nine unit processes (Figure 12):

- Receiving. Tuna are received at the processing plant either fresh (fish harvested locally) or frozen whole in brine (those brought in by high seas tuna clippers). The tuna are unloaded into one ton bins and then transported to the scale house for weighing. At this point, depending on whether the fish is still frozen or production is back-logged, the catch may be processed directly, sent to frozen storage, or sent to refrigerated storage. Fish imported from foreign countries are received and kept frozen until ready for processing.

Figure 12. Flow diagram for a typical tuna processing plant.



Source: U.S. Environmental Protection Agency. 1974a. Development document for proposed effluent limitations guidelines and new source performance standards for the catfish, crab, shrimp, and tuna segments of the canned and preserved seafood processing point source category. EPA-440/1-74-020. Washington DC.

- Thawing. Fish to be thawed are placed in large thaw tanks which hold 8 to 10 one ton bins. The end plates on the tank are removed and the bins are placed by fork lift. When loaded, the end plates are replaced and the tank flooded. Thawing may be with static or circulating sea and fresh water. Some plants heat the water with steam to speed up the thaw rate.
- Butchering. After thawing, the tanks are drained and the bins of tuna removed with a forklift and placed in an automatic dumper located at the head of the processing line. The tuna are then dumped on a shaker conveyer which spreads them and carries them to a butchering table. Here the body cavities are opened with a saw and eviscerated. These saws are continuously washed with small water jets. The saw cuttings and washings drip onto the floor and then flow into an outer drain under the butcher table. The tuna is then washed and checked organoleptically for freshness. The viscera (10% to 15% of the tuna by weight) are placed in barrels. Putrescent tuna are discarded and sent to the reduction process along with the viscera.
- Precooking. In order to facilitate processing, the tuna are placed in trays set into racks for precooking, a process which loosens the tuna meat from the bone and skin. (The larger tuna are cut in smaller pieces and placed on the trays.) Cookers holding 10 tons of fish are filled with live steam and held at a temperature of 93°C (200°F) for 2 to 4 hours. The stick water (steam condensate, fish oils and liquids) collects in the cookers and is pumped to the solubles plant for by-product manufacture.
- Cleaning. The racks of precooked fish are cooled for about 12 hours in a holding or cooling room. The cooled tuna are removed from the racks and placed on tables that have an elevated stainless steel conveyer running along the packing machine, and at each of the work stations, hoppers which lead to a below table conveyer. The head, fins, skin, tail, and bone are manually removed from the fish and deposited in the hopper; the belt carries the solids (30 to 40% of the tuna by weight) to a collection station where they are taken to a fish meal reduction plant. The red meat (6 to 10% of the tuna) is then scraped from the fish, placed in containers, and sent to the pet food production area. The four loins which remain are put on the upper conveyor belt to the can packing machine.
- Canning. The packing machine shapes the tuna meat and places it in cans. Chunk style tuna is prepared from broken sections and solid pack tuna from the loins. A mixture of soybean oil, salt brine, and monosodium glutamate (MSG) is added to replace lost oils, improve taste, and aid removal from the can. Any overflows from the additive line which occur during packing are collected, filtered, and recirculated. The cans are seamed under vacuum pressure, prerinsed with recirculated water, soap-washed with recirculated waters, and final-rinsed with clear water. An antispotting agent is sometimes added in the final rinse to reduce mineral deposition on the dry cans.
- Retorting. The cans are conveyed to the retorts where they are subjected to a temperature of 121°C (250°F) for 90 minutes to sterilize

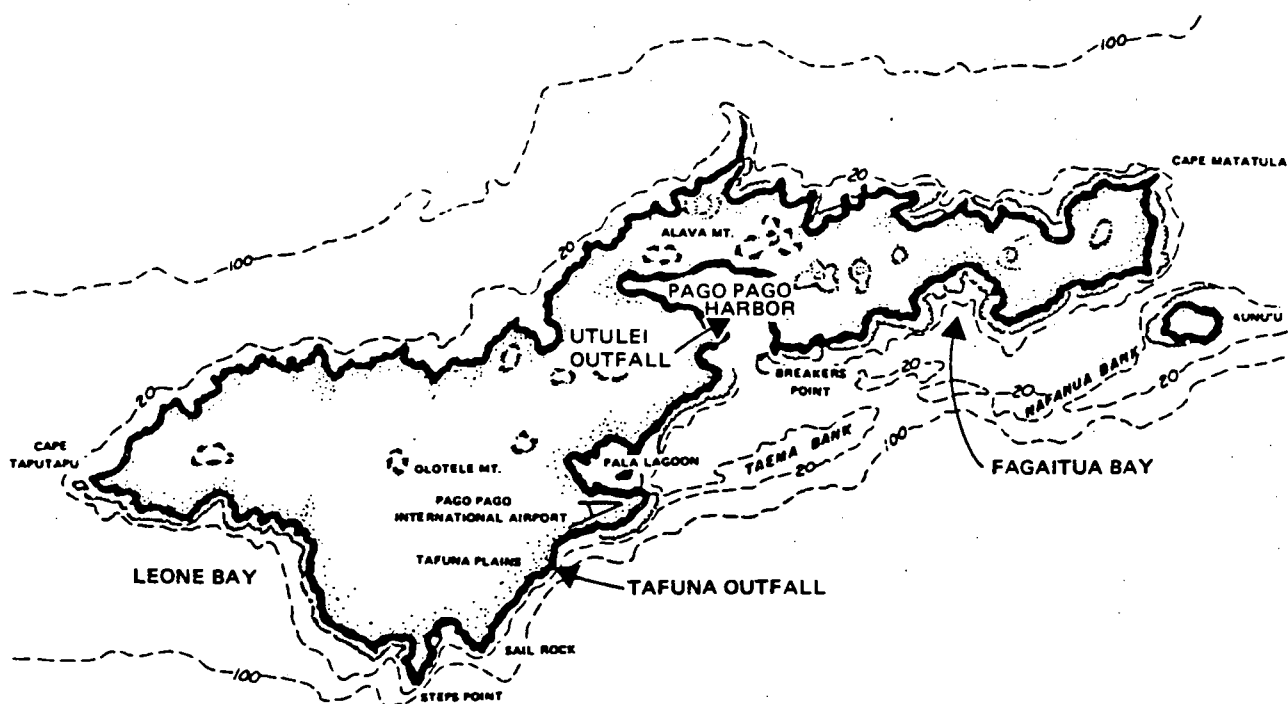
the product, after which the retort pressure is reduced and the cans cooled with circulating cold water. The cans then are removed for drying and finish cooling.

- Labelling and Casing. After cooling, the cans are labeled and boxed. Sterilization of the tuna is necessary to ensure that all organisms in the can are destroyed and especially to prevent botulism caused by the bacteria Clostridium botulinum. All cans are coded at the time of steaming and a representative number of cans from each lot are tested. Each coded lot is sent to a certain market or distributor.

The scraps generated by production of edible canned tuna, screenings from washdown waters, and meat cleaned up before washdown are ground, cooked, and pressed in the reduction area to remove oils and liquids (press liquor). The solids (press cake) are dried, ground, bagged, and marketed as fish meal for use as animal feeds, fertilizer, and many other products. The press liquor, stick water, and sometimes a slurry of ground viscera are then concentrated by heating under vacuum. The oil separated from this liquor is sold as animal feed additives and for other uses. The red meat is sent to a special pet food production area where the cans are mechanically filled, sealed, and rinsed before being conveyed to the retorts. Some plants receive meat and poultry viscera and parts; these are cooked in vats and processed with the red meat in the pet food line.

1.2.2.12 Fish Meal Processing (Figure 13)

This industry segment converts fish to a basic meal product rather than to a commercial food product. Menhaden and anchovy are the two main raw materials used for this purpose. The menhaden is a small fish belonging to the herring family, with two species (Brevoortia tyrannus and Brevoortia patronus) of commercial importance. Ninety-nine percent of the menhaden landed in the United States are used for fish meal, oil, and fish solubles. The meal is used as animal feed, the solubles as liquid fertilizer, and the oils are either exported for use in shortenings and margarine or used domestically in the manufacture of protective coatings, lubricants, medicinals, and some soaps. The northern anchovy (Engraulis mordax) is a small (6 inch) pelagic fish whose body content is high in oil. Previously most anchovies were canned for human consumption or used for bait, but their decline in popularity as a food has promoted development of an anchovy fish-mealing industry on the West Coast.



0368

DEPTH IN FATHOMS



Water stratified in compression?



Ralston Purina
Company

rec'd 11/25/86

November 21, 1986

Mr. Norman L. Lovelace
Chief, Office of Territorial Programs
Environmental Protection Agency, Region 9
215 Fremont Street
San Francisco, CA 94105

Re: Samoa Packing Company NPDES Permit - Production Levels

Dear Mr. Lovelace:

Confirming our phone conversation of November 20, Samoa Packing Company respectfully requests an increase in its nominal maximum production levels to 375 tons per day. The current permit application is for 320 tons per day.

The increases in daily maximum production will principally allow greater equipment utilization when all equipment is functional. It is not expected that the increase will result in a correspondingly proportionate increase in actual annual tonnage.

On at least some days in November, more than 320 tons were processed. We will provide the detailed production figures with the appropriate DMR report. We do not believe there were any apparent permit variations associated with this increase in tonnage, nor are any expected at the new nominal maximum level of 375 tons per day. Hydraulic flow may increase somewhat, however.

As always, we appreciate very much your cooperation. Please advise of any questions.

Sincerely,

Frank H. Hackmann
Associate Counsel
314-982-2619

plp
cc Manley Sarnowsky - SAMPAC
R. Degges - 12T
F. Avers - 12T
S. M. Rea - 7T
Pati Faiai - EQB

0305

RECORD OF COMMUNICATION		<input checked="" type="checkbox"/> PHONE CALL <input type="checkbox"/> DISCUSSION <input type="checkbox"/> FIELD TRIP <input type="checkbox"/> CONFERENCE	
		<input type="checkbox"/> OTHER (SPECIFY)	
		(Record of item checked above)	
TO:	FROM:		DATE
Lovelace	Frank Hackman Samoa Packing		11/20/86
			TIME 12:20
SUBJECT			
Production Level Increase - daily maximum			
SUMMARY OF COMMUNICATION			
<p>Hackman called to advise that he had just learned that daily production levels has occasionally reached 344 tons. They are apparently packing as much as possible on days when the fish meal unit is working well. Monthly production about the same. Hackman wanted to know how to request increase for (from 320/day to ~350/day) for new permit. Told him I wasn't sure - but suggested he send in a letter. Also told him that the people running the plant in Samoa should know the permit requirements and get in touch w/ ASEPA.</p> <p>He also said he knows of no effluent violations as a result of high production days.</p>			
CONCLUSIONS, ACTION TAKEN OR REQUIRED			
None at this time			
0369			
INFORMATION COPIES			
TO: Collier/Wiegman & Lincoff/Narvaez			

AMERICAN SAMOA GOVERNMENT
PAGO PAGO, AMERICAN SAMOA 96799
OFFICE OF THE GOVERNOR
ENVIRONMENTAL PROTECTION AGENCY

In reply refer to:
Serial: 330

October 20, 1986

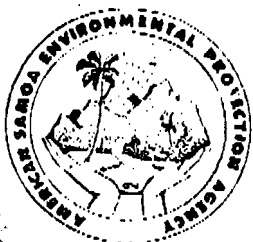
Mr. Norman Lovelace, Chief
Office of Territorial Programs
U.S. Environmental Protection Agency
Region IX
215 Fremont Street
San Francisco, California 94105

Dear Mr. Lovelace:

On Friday, October 17, the Environmental Quality Commission discussed the proposed Draft National Pollution Discharge Elimination System (NPDES) permits for Star Kist Samoa, Inc. and Samoa Packing Company. In light of the recent American Samoa Government (ASG) - Joint Cannery Study meeting we feel that in order to continue towards Water Quality Standard compliance in the harbor with the least degree of litigation, combined with a cooperative effort from the canneries, changes in the proposed permits should be considered.

The following are recommended principles to be incorporated into the NPDES permits.

1. Both canneries should be required within one (1) year of the effective date of the permits to have completely implemented high strength waste segregation.
2. To ensure accurate monitoring of the amount of Nitrates and phosphates being discharge in relation to the volume of waste water flow into the receiving waters, we feel that the draft permits composite sampling requirements should be followed.
3. Harbor Water Quality sampling will continue on a monthly basis for three years following the issuance of the new NPDES permits.
4. The canneries should be required to conduct an extensive current monitoring program in the vicinity of the proposed outer harbor discharge.
5. At the end of three years following the issuance of the NPDES permits the harbor water quality conditions will be determined based on the



re: 40 CFR 124.53

WTR


0327

generated data. A period of six months should be allowed to make this determination. At the end of six months a decision should be made on the program to be followed to achieve full compliance with the water quality standards for Pago Pago Harbor when the proposed NPDES permits expire five years after their issuance.

6. Decisions on granting of the zone of mixing and interpretation of monitoring data for enforcement purposes should be delayed until the six month final evaluation period.
7. Proposed outfall 002 for Star Kist Samoa should accommodate only storm water discharge. No other waste water flows, contact or non-contact, should be allowed to discharge at this point. If one or more of the proposed waste water flows are, in the opinion of the U.S. EPA and ASEPA, found not to contain contaminants which would violate ASG water quality standards disposal at outfall 002, could be reconsidered.

Although the aforementioned provisions vary considerably from the Draft NPDES permits the EQC considers these steps necessary to continue progressing towards improved water quality conditions in the harbor.

Sincerely,



LYLE RICHMOND, CHAIRMAN
ENVIRONMENTAL QUALITY COMMISSION

0328

W-1-1

10/9/86

RECEIVED
FBI
OCT 10 1986

TO: NORM LOVE LAKE

OCT 10 1986

FM: LYLE RICHMOND

I'M FAXING THE ENCLOSED LETTER TO YOU SO THAT YOU WILL HAVE A WRITTEN DESCRIPTION OF THE RESULTS OF LAST WEEK'S MEETINGS WITH THE CANNERIES BEFORE OUR TELEPHONE CONFERENCE TOMORROW.

BOTH CANNERIES HAVE SEEN DRAFTS OF THE LETTER AND HAVE INDICATED AGREEMENT ON ITS ACCURACY WITH RESPECT TO THE MEETINGS.

0329



TERRITORY OF AMERICAN SAMOA

OFFICE OF THE GOVERNOR

FAGATOGO 96799

A. P. LUTALI
GOVERNOR

ENI F. HUNKIN, JR.
LIEUTENANT GOVERNOR

(684) 833-4118

October 9, 1986

Serial: 1805

Norman Lovelace, Chief
Office of Territorial Programs
U.S. Environmental Protection Agency
Region IX
215 Fremont Street
San Francisco, California 94105

Dear Mr. Lovelace:

On October 2 and 3, 1986, representatives of the American Samoa Government, Samoa Packing Company and Star-Kist Samoa, Inc. met at the offices of Star-Kist Foods, Inc. in Long Beach, California to discuss the Draft Phase II Report prepared by CH2M Hill as the engineering consultant engaged by the three principals to study alternatives for the reduction of fish cannery waste water effluent loading into Pago Pago Bay and the program to be undertaken as a result of this study.

Participants at the meetings were:

American Samoa Government

Lyle L. Richmond, Legal Counsel to the Governor
Michael Dworsky, EPA Construction Grants Manager
Ward Conaway, former EPA Construction Grants Manager

Samoa Packing Company

Fred H. Avers, President
Frank Hackman, Associate Counsel, Environment and Energy
Ron Degges, Director, Production and Engineering

Star Kist Samoa, Inc.

Jeffrey R. Naumann, Manager, Environmental Engineering
Dave Ballands, General Manager, Engineering Can Making Services

At the conclusion of the meetings the participants reached the following understanding on the program for the future.

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3/86

1. Samoa Packing and Star-Kist Samoa shall have in full operation within one (1) year systems of high strength waste segregation, which wastes shall be ocean disposed. The year shall commence with the issuance of the canneries' new NPDES permits.

2. During the first three years following issuance of the new NPDES permits, water sampling shall continue on a monthly basis for analysis of effluent content. Additionally, currents in the vicinity of the proposed outer harbor discharge area shall be monitored extensively.

3. At the end of the first three years following issuance of the new NPDES permits, the three principals and probably an independent consultant selected mutually would separately and collectively evaluate the condition of Pago Pago Bay on the basis of the data collected during the first three years and other relevant observations and criteria for a period of six months. A decision would be made, mutually if possible, at the end of this six-month period on the program to be followed to achieve full compliance with the water quality standards for Pago Pago Bay when the new NPDES permits expire five years after their issuance.

4. No decisions or commitments shall be made at this time with respect to final disposal alternatives, interpretation of monitoring data for enforcement purposes, or granting any zone of mixing around any point of discharge. These decisions and commitments would be made during the six-month final evaluation period following the three-year data collection period after issuance of the new NPDES permits. All principals reserve their respective rights to establish their positions on these issues and to legally challenge them if mutual decisions or commitments are not determined by the end of this six-month period.

The Government contemplates this program for three basic reasons. First, this program essentially reflects the intent of the principals developed at their interim meeting in September 1985 at Honolulu, Hawaii on Phase II of the study to provide for high strength waste segregation followed by a monitoring period to determine the actual effects segregation.


Second, this program ensures the near-term implementation of high strength waste segregation systems in a spirit of mutual cooperation between the principals towards the objective of improving the water quality of Pago Pago Bay to acceptable levels as contemplated by the tax exemption agreements between the Government and each of the canneries. It is mutually believed that high strength waste segregation is a key initial step towards this objective which should be taken now.

Third, this program should provide substantially more reliable data as the basis for determining the action required to accomplish real long-term improvement in the water quality of Pago Pago Bay, particularly the inner harbor area, consistent with necessary economic and other social activity in the Territory.

AN LOVELACE
ge -3-
10/9/86

This program is, we believe, a positive, constructive and relatively concrete step towards practicable enhancement of Pago Pago Bay waters. Therefore, it is requested that the U.S. Environmental Protection Agency revise the proposed new NPDES permits for the canneries to reflect the participants' understanding as set forth above. Essentially, this revision only postpones final determinations on waste disposal alternatives in the immediate future, six months hence, until a time when more reliable data three years from now will be available to justify those critical decisions. With your agency's concurrence on the proposed program, the principals can move forward with its implementation.

Sincerely,



LYLE L. RICHMOND
Legal Counsel to the Governor

LLR:mtl

0332



Ralston Purina
Company

October 7, 1986

Mr. Norman L. Lovelace, Chief
Office of Territorial Programs
Water Management Division
U.S. EPA, Region IX
215 Fremont Street
San Francisco, CA 94105

Re: Samoa Packing Company, Inc. NPDES Permit No. AS0000027

Dear Mr. Lovelace:

As outlined in our previous communications, we recently met with representatives of the American Samoan government and Star-Kist to discuss the proposed final draft NPDES permits for American Samoa.

After consultation, we believe that the program outlined below is acceptable to representatives of the American Samoan Government, the Environmental Quality Commission, Star-Kist and Samoa Packing Company, Inc. We therefore request that the permit, as issued to SAMPAC, be modified consistent with the following:

- o The canners will be required to commence high-strength barging (press water and cooker juice), coupled with continued ocean disposal of DAF sludge, within 12-15 months.
- o The American Samoan Government will collect, and the canner's environmental trust fund will pay for, monthly collection and analysis of samples from the harbor at the sampling stations described in the permit. Analysis will be for the parameters described in the permit.
- o Appropriate current testing will be commenced in the general area of the possible outer harbor outfall at the time that ocean disposal of both high-strength waste and sludge is commenced. This current testing will be for at least one year. It may be extended, if necessary in the judgment of our consultant.
- o At the conclusion of two years of monitoring, following the date for implementation of high-strength barging, the data acquired from harbor sampling will be summarized.
- o A period of six months will then be allowed for evaluation of the effects of high-strength segregation and ocean disposal, the sampling station results and the current meter results. At the end of these six months, the parties will be able to do one of the following as indicated by the factual information:
 1. Proceed to a Total Daily Maximum Load Allocation hearing with respect to phosphorus and/or nitrogen loading.

0306

2. Reevaluate the standards if it appears appropriate in EQC's or ASG's judgment.
 3. Evaluate further options, such as an outer harbor outfall, an extended outfall, ocean barging of additional waste streams, restrictions in production, or other options as appropriate.
- o For the Program alternative(s) selected, an implementation plan development period will be allowed.
 - o Complete implementation will be targeted to the end of the five-year permit term, or if that is not possible due to physical/logistical/administrative constraints, completion of the program during the next NPDES permit cycle.

In analyzing this program, we urge EPA to consider several key facts:

First, the American Samoan Government agrees that a significant reduction in nutrient loading will occur with this program, and that the results of it should be determined before additional measures are required.

Second, the American Samoan Government does not wish to be unreasonably tied down to a numerical standard of water quality if that standard can be substantially met and further measures necessary to meet it would pose unreasonable hardships on the island of American Samoa, its government or its people.

Third, the American Samoan government would be willing to defer action on pending mixing zone applications previously filed by the canners until the six-month data analysis time period has expired.

As noted previously, the monthly sampling program previously conducted would continue with respect to the stations in the harbor. These stations would continue to be sampled at two depths with analysis performed by a qualified, independent laboratory. Also, at least two current meters would be required per location, at two different depths, in the general area of the possible outer harbor outfall location. CH2M Hill will be consulted regarding current meter placement.

We recently received a copy of a letter dated September 22, 1986 addressed to you from Mr. Pati Faiai, the Executive Secretary of the Environmental Quality Commission. We do not concur with all of the observations made in Mr. Faiai's letter. Further, we believe that a major change in determining how water quality standards compliance is computed is properly the subject of formal rulemaking pursuant to the Environmental Quality Commission's requirements, not the proper subject for an administrative interpretation by its Executive Secretary. However, in the interest of not expending resources, both manpower and financial, in litigation which may not ultimately be

October 7, 1986
Page Three

necessary, we are willing to defer legal challenges on the precise method of determining water quality standards compliance and the timing of any potential Total Daily Maximum Load allocation hearing, so long as our right to those hearings at an appropriate future time is not waived. We believe the program outlined above will preserve our rights to raise these issues. We understand that the American Samoan Government concurs with our interpretation.

Summarizing, we believe this program is a meaningful response to the desires of the American Samoan government and the EPA. At the same time, it recognizes the unique characteristics of American Samoa. The program would require high-strength bargaining to commence within approximately one year. It would require detailed ongoing monitoring of specified sampling stations in the harbor. There would then be a six-month time period for evaluation of program results, coupled with a structured decision-making process, which would include, if necessary, a Total Daily Maximum Load allocation hearing and the selection of appropriate methods to comply with any further reductions which may be necessary. A compliance schedule would then be prepared with time allowed for the compliance schedule preparation. The schedule could then be implemented near the end of the first five-year permit term or commensurate with the reissuance of the next NPDES permit.

We believe this program is very meaningful and meets the needs of the American Samoan Government, the U.S. EPA, and the canners. We respectfully urge your approval of the program. We further request that appropriate modifications, reflecting this program, be contained in the final NPDES permit issued to Samoa Packing Company.

We will meet with EPA to discuss these issues further should you think it necessary. Again, thank you very much for extending the comment period until October 10 to permit inclusion of these comments and for your past cooperation.

Sincerely,



Frank H. Hackmann
Associate Counsel
314-982-2619

plp

cc Danny Collier, U.S. EPA
Lyle Richmond, Assistant to Governor, American Samoa
Pati Fai'ai, Executive Secretary, Environmental Quality Commission
Mike Dworsky, Department of Public Works, American Samoa
Dave Ballands, Star-Kist
Manley Sarnowsky, General Manager, SAMPAC
Ronald M. Degges, Van Camp
John Lee, CH2M Hill
Ward Conaway, Public Health Service

0308



U.S. DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
Southwest Region • Western Pacific Program Office
2570 Dole St. • Honolulu, Hawaii 96822-2396

September 23, 1986 F/SWR1:ETN

Mr. Frank M. Covington
Director, Water Management Division
Region IX
Environmental Protection Agency
215 Fremont Street
San Francisco, CA 94105

Dear Mr. Covington:

This responds to your letter of August 21, 1986 to Mr. Eugene T. Nitta of my staff requesting a list of threatened and endangered species or designated critical habitat found in the vicinity of the waste water discharges for Star-Kist Samoa Inc. and Samoa Packing Company in American Samoa.

Listed species under the jurisdiction of the National Marine Fisheries Service that may be generally found in the nearshore waters of Tutuila include the endangered hawksbill turtle (Eretmochelys imbricata) and the threatened green turtle (Chelonia mydas) in small numbers throughout the year. The endangered humpback whale (Megaptera novaeangliae) is a seasonal visitor, found within the 100 fathom isobath around the Islands of American Samoa during the southern winter months. To our knowledge critical habitat for these species has not been proposed or designated in American Samoa.

We have reviewed the discharge limits proposed for the two canneries and find that the issuance of the NPDES permits will not likely adversely affect the listed species noted above.

This concludes the Section 7 process for this project. Should the permit conditions be subsequently modified, or an effect not previously considered becomes evident, consultation must be re-initiated at that time. If there are any further questions please contact Eugene Nitta, Protected Species Program Coordinator at 808-955-8831.

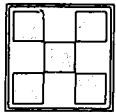
Sincerely yours,

John J. Naughton
Acting Administrator

cc: F/SWR

0333





Ralston Purina
Company

RECEIVED
U.S. EPA
REGION 9
COMM. CENTER

October 18, 1984

'84 OCT 22 A10:22

Mr. Andrew Lincoff
United States Environmental Protection
Agency - Region IX
215 Fremont Street
San Francisco, CA 94105

Re: NPDES AS0000027, Samoa Packing Company

Dear Mr. Lincoff:

Confirming our telephone conversations, our response to the letter dated October 3, 1984 is.

1. Because the tuna cannery is shut down for renovation, it is not possible to take representative DAF effluent samples. The DAF effluent will be sampled, once normal production operation is achieved, for those parameters discussed under items V-A and V-B in the letter. We anticipate sampling between late March and early May, 1985.
2. The application is considered sufficient by EPA to meet the requirements of the Administrative Procedures Act regarding permit renewal.
3. While the EPA has not made a final determination regarding BCT for Samoa Packing Company, it is seriously considering our proposal that the current effluent limits equal BCT. Should the Agency's position regarding BCT change, you will promptly advise so that additional discussions can occur.
4. The joint water quality study, now underway, will be considered along with other relevant factors in the permit renewal process.
5. With respect to those items listed in item V-D, these reference items which are "believed absent" or "believed present." Accordingly, there will be no sampling specific for item V-D other than the sampling referenced for V-A and V-B.

Thank you again for your attention to these matters. Please contact me at your convenience should you have any questions or comments.

Sincerely,

Frank H. Hackmann
Environmental and Energy Counsel
(314)982-2619

FHH:swb

cc: Patricia D. Eklund, Chief
Water Quality Permit Section, EPA

0322

bcc: F. Avers - 12T
J. J. Wass - 12T
J. Stephens - 12T
B. Lemke - American Samoa

0323

OCT 3 1984

Fred H. Avers, Vice President
Ralston Purina Company
Checkerboard Square
St. Louis, Missouri 63164

Re: NPDES No. AS0000027, Samoa Packing Company

Dear Mr. Avers:

We have conducted an initial review of your NPDES permit renewal application, dated September 27, 1984, and have found the following deficiencies:

1. Item V-A. You must provide the results of at least one recent analysis for each pollutant listed in this table. The statement, "COD, TOC, and ammonia data filed previously with EPA," is insufficient.
2. Item V-B. You must provide the results of at least one analysis for each pollutant marked "Believed Present" in column 2a unless you believe it to be present solely as a result of its presence in your intake water, in which case you may mark an "X" in the "Intake" column. You may not mark "Believed Absent" solely because a substance is not used in your production processes. If you know or have reason to believe that any of the substances listed is present in your discharge for any reason, you must mark "Believed Present."
3. Item V-D. You must list any pollutant listed in Table 2c-3 of the instructions which you know or have reason to believe is discharged or may be discharged from any outfall. Your response to this question may not be limited to those substances used in your manufacturing processes. If, for example, you know or have reason to believe that one of the pollutants is present in your intake water, you must list it in Item V-D.

If you have any questions concerning this matter, please contact Andrew Lincoff, at (415) 974-8284.

Sincerely,

0324

Patricia D. Eklund
CONCURRENCES

Chief, Water Quality Permits Section

SYMBOL	10V-5-1	OTF W-1-1	W.S.1				
SURNAME	LINCOFF	3/lor	Eklund				
DATE	10/2/84	10/2/84	10/3/84				

~~Ken S.~~ → Madama
FYI
PC w-1-1



rec'd EPA 10/6/86
ARC

AMERICAN SAMOA GOVERNMENT
PAGO PAGO, AMERICAN SAMOA 96799
ENVIRONMENTAL QUALITY COMMISSION
GOVERNMENT OF AMERICAN SAMOA
SEPTEMBER 22, 1986

In reply refer to:
Serial: 284

Norm Lovelace, Chief
Office of Territorial Programs
U.S. Environmental Protection Agency
Region IX
215 Fremont St.
San Francisco, California 94105

RE: Water Quality Standards compliance clarification

Dear Mr. Lovelace:

The Environmental Quality Commission (EQC) was directed by ASCA 24.0106(10) to "establish air and water quality standards for the territory". The adoption of Rule 8-81 by the EQC fulfilled this mandate with respect to water quality. The standards classify the waters of the Territory of American Samoa and establish standards for each classification.

However it has come to our attention over the past year that the methodology for enforcing the water quality standards (WQS) has not been clearly stated by the EQC and has led to some misunderstandings in regard to the Pago Pago Harbor.

In adopting the current WQS the EQC expressed the policy that all waters of the harbor will receive equal protection. 'The EQC did not then, and does not now, envision a compliance determination methodology that would, in effect, provide for unequal minimum levels of water quality in the harbor. The only exception to this is within approved mixing zones that are established under the criteria in the WQS. The EQC recognized that there are substantial differences in water quality in the harbor system. Specifically, the inner harbor area is significantly lower in quality than the outer harbor area. The WQS that apply to the harbor were developed with these differences in mind. The entire harbor system was studied in detail to formulate the WQS. The resulting WQS prescribe a minimum level of water quality for harbor waters that is somewhat lower than would occur naturally because of the various influences present in the harbor. The EQC's policy is that all waters within the harbor are to achieve the minimum level of water quality specified in the WQS.

As you may recall from our discussions in September of "85" the question EPA raised was how does EQC determine whether or not violations of the American Samoa WQS exists in Pago Pago Harbor. Two different methods of interpretation have been presented over the past year in our discussion of this subject. The EQC in adopting this statement of clarification is not revising the WQS at this time, although the WQS are scheduled for review in FY 87. Clarification on this point is particularly important now because of the nearing finalization of the Phase II report of the Joint Study and the NPDES permits for the two canneries.

In reviewing this issue, one interpretation is that the compliance status of the WQS is ascertained by performing the specified statistical analysis on the data from all the monitoring stations in the inner harbor, outer harbor and transition zone collectively. Some of the confusion over this issue comes from some of the documents prepared during the WQS development. These documents describe suggested monitoring programs and data analysis to evaluate water quality. However, these documents were designed to serve a purpose other than making specific regulatory decisions regarding compliance with the WQS. The program set forth in the documents are useful aids in making statistical overview evaluations of water quality and providing an information base for future reviews and revisions of the WQS. A meeting with Mr. Hans Krock, editor of the "American Samoa Water Quality Monitoring Handbook" in June "86" confirmed that it was never intended or designed for the purpose of making localized and specific decisions regarding WQS compliance. The documents are not referenced in the WQS themselves and would not seem to have any regulatory status.

The WQS were developed in compliance with the Clean Water Act which has as its objective "to restore and maintain the chemical, physical, and biological integrity of the Nation's Waters". Any interpretation which advocates averaging data from many points has the effect of masking localized water quality problems by combining them with other areas that may have acceptable water quality. Thus, although a portion of the harbor is violating WQS while others are in compliance, the result would be that the entire harbor is erroneously judged to meet the WQS. This is not the intent of the WQS, nor do we believe it the intent of the U.S. Environmental Protection Agency when you approved the WQS.

~~The EQC has interpreted the compliance of the WQS as determined by considering the data from each point separately and that the compliance status is determined on a point-by-point basis.~~ This interpretation is consistent with many provisions of the WQS, and with other State WQS throughout the land. The provisions for granting of mixing zones and the associated prohibitions (e.g., not allowed within 500 feet of Goat Island Point...no part of a shoreline, reef or bottom substrate shall be included in any zone of mixing) suggests that the WQS are intended to apply to every point in the harbor. Mixing zones are designed to provide for

localized, alternate standards within the zone (under stringent conditions) to reflect the physical and practical realities of treatment technologies. ~~In some ways the averaging approach would define the entire inner harbor as a mixing zone, which is clearly contrary to the WQS.~~

Mixing zones are designed to provide localized variations from WQS in cases where "Compliance with the existing WQS at the point of discharge would produce serious economic hardships without equal or greater benefit to the public..." Also, mixing zones must meet several other criteria specified in the WQS, including the requirement that WQS be achieved at the boundaries of the mixing zone. The mixing zone provisions of the WQS clearly illustrate that the EQC intends to have the WQS apply equally to every point within the harbor.

In conclusion, the EQC's policy is that all points within the harbor are to be considered separately for purposes of determining WQS compliance. For purposes of evaluating overall water quality and determining general trends, the data interpretation methods that combine data from various locations in the harbor will continue to be used. We will be preparing detailed data interpretation procedures for determining WQS compliance that will embody the following principles:

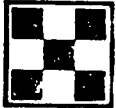
- o Compliance will be determined at each point within the harbor separately (e.g., point-by-point).
- o Compliance will be determined using the temporal variations specified in the WQS.
- o Compliance will be determined at any particular time by analyzing the previous 12 months of data.

We hope to have this procedure fully documented within a month and will provide you with a draft copy to review.

Sincerely,



Pati Faiai, Executive Secretary
Environmental Quality Commission



Ralston Purina
Company

September 15, 1986

Mr. Lyle Richmond
Assistant to Governor
EQC American Samoa
Governor's Office
Pago Pago, American Samoa 96799

Re: Your letter dated July 21, 1986

Dear Mr. Richmond:

I apologize for my delay in responding to your July 21 letter. We are very pleased that ASG is prepared to meet and approach positively the establishment of reasonable water quality control programs for American Samoa. We believe it is vital to the well-being of the American Samoan economy, its government, and its people, to maintain an appropriate balance between environmental standards and the many other demands on economic resources in Samoa.

We are particularly concerned at the implication that the American Samoan government may now believe that there should, in effect, be an "inter" and "outer" harbor standard. We believe that the methodology referenced in the American Samoan water quality standards is quite clear that all sample points are to be reduced to a single point for purposes of determining water quality compliance. If this is not the intention of the American Samoan government, or if the intention of the Samoan government is to change from this direction, we believe that issue should be dealt with as soon as possible.

The American Samoan government has been asked to submit a water quality certificate to the U.S. Environmental Protection Agency in conjunction with the reissue of the NPDES permits for SAMPAC and Star-Kist. It is, and has been, our position that the water quality in American Samoa conforms to the applicable standards or, in any event, will conform to such standards once high-strength barging of pressed water cooker juice and sludge is accomplished. As you know, SAMPAC is committed to this program.

We believe that any further demands on the canners for significant wastewater reduction expenditures are counterproductive and not in the best interests of the American Samoa government or its people.

While we do not wish to engage in formal litigation with ASG or EPA on this issue, we must protect what we believe are our proper interests. We also must communicate to the government those items of grave concern to us. I believe that if the American Samoan government makes a formal determination that the harbor does not meet water quality standards, or if the U.S. EPA makes that formal determination, SAMPAC

0309

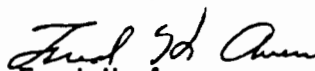
Mr. Lyle Richmond
September 15, 1986
Page Two

will have no choice but to seek a hearing pursuant to the Section 303 of the Clean Water Act to establish appropriate total daily maximum loadings for all dischargers into the harbor, including dischargers who now claim to be exempt from such limitations. It is very much our desire to avoid this result, but we simply cannot be in the position of receiving a five-year NPDES permit without a clear understanding of what activities on our part will constitute satisfactory performance. Our management is entitled to know this at the outset of the permit term, as are we.

We look forward very much to meeting with you in late September or early October regarding these issues. By this letter, we are requesting an extension of the comment time with the U.S. EPA to permit additional input into the record based on what transpires at our meeting.

We believe that high-strength barging to sea, coupled with the continued efficient operation of the DAF will mark another significant environmental improvement in the quality and nature of the wastewater discharge from our cannery. We believe that no more action on our part is necessary to insure compliance with the current water quality standards. We would vigorously oppose any interpretation to the contrary. I trust this answers the points raised in your July 21 letter. If it does not, please advise at your convenience. Thank you very much.

Sincerely,



Fred H. Avers
Vice President and Director
Production Operations

plp
cc Norman Lovelace, EPA, Region IX
Pati Faiai, EQC, American Samoa

0310



United States Department of the Interior

FISH AND WILDLIFE SERVICE

300 ALA MOANA BOULEVARD
P.O. BOX 50167
HONOLULU, HAWAII 96850

IN REPLY REFER TO:

AUG 25 1986

Mr. Frank M. Covington
Director, Water Management Division
U. S. Environmental Protection Agency
Region IX
215 Fremont Street
San Francisco, California 94105

Dear Mr. Covington:

This responds to your August 21 letter concerning your proposal to reissue NPDES permits for the following tuna canneries in American Samoa:

Star-Kist Samoa, Inc.
~~Samoa Packing Company~~

Specifically, you requested a list of plants and/or animals which are listed or proposed for listing as endangered or threatened species under the Endangered Species Act.

Although the green sea turtle (*Chelonia mydas*) may swim in the waters of Pago Harbor in the vicinity of the cannery outfalls, we would not expect them to be affected by the discharges as described in your letter. These turtles are not known to nest near any of the areas which may be affected by such discharges. As sea turtles, while at sea, fall under the jurisdiction of the National Marine Fisheries Service, you may wish to also contact them for comment.

Thank you for allowing us to comment on this proposal.

Sincerely yours,

William R. Kramer
Acting Project Leader
Office of Environmental Services

0337



Save Energy and You Serve America!

PS Form 3811, July 1983 447-845

DOMESTIC RETURN RECEIPT

SENDER: Complete items 1, 2, 3 and 4.

Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for service(s) requested.

- ☒ Show to whom, date and address of delivery.
- ☐ Restricted Delivery.

3. Article Addressed to:
**FRANK H. HACKMAN, Associate
 Counsel of ENVIRON.
 Ralston Purina Co., Inc.
 CHECKERBOARD SQUARE
 ST. LOUIS, MISSOURI 63164**

4. Type of Service: Article Number

☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail

0416103

Always obtain signature of addressee or agent and **DATE DELIVERED**

5. Signature — Addressee **X**

6. Signature — Agent **X** *Perry Dickerson*

7. Date of Delivery **AUG 21 1986**

8. Addressee's Address (ONLY if requested and fee paid)

No. 0416103

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED—
NOT FOR INTERNATIONAL MAIL

(See Reverse)

SENT TO **Frank H. Hackman**

STREET AND NO. **Ralston Purina Co.**

P.O., STATE AND ZIP CODE **Van Camp Seafood Div**

POST OFFICE **Checkerboard Square**

CITY **ST. LOUIS, Missouri**

STATE **63164**

RESTRICTED DELIVERY

CONSULT POSTMASTER FOR FEES

OPTIONAL SERVICES

RETURN RECEIPT SERVICE

SHOW TO WHOM AND DATE DELIVERED

SHOW TO WHOM, DATE, AND ADDRESS OF DELIVERY

SHOW TO WHOM AND DATE DELIVERED WITH RESTRICTED DELIVERY

SHOW TO WHOM, DATE AND ADDRESS OF DELIVERY WITH RESTRICTED DELIVERY

TOTAL POSTAGE AND FEES \$

POSTMARK OR DATE

August 21, 1986

PS Form 3800, Apr. 1976

P 017 638 032

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

(See Reverse)

★ U.S.G.P.O. 1984-446-014	Sent to	Mailey Sarnowsky
	Street and No.	Plant Manager
	P.O., State and ZIP Code	Samoa Packing Co.
	Postage	P.O. Box 957
	Certified Fee	Pago Pago, AS
	Special Delivery Fee	96799
	Restricted Delivery Fee	
	Return Receipt Showing to whom and Date Delivered	
	Return receipt showing to whom, Date, and Address of Delivery	
	TOTAL Postage and Fees	\$
PS Form 3800, Feb. 1982	Postmark or Date	August 27, 1986



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

215 Fremont Street
San Francisco, Ca. 94105

Return Receipt Requested

Certified Mail: 0416103

21 AUG 1986

Frank H. Hackmann
Associate Counsel of Environment
and Energy
Ralston Purina Co., Inc.
Van Camp Seafood Division
Checkerboard Square
St. Louis, Missouri 63164

Dear Mr. Hackmann:

Enclosed is a copy of the draft permit, public notice and statement of basis of our proposed action on your application for a National Pollutant Discharge Elimination System (NPDES) permit for:

Samoa Packing Company, Inc.
P.O. Box 957
Pago Pago, American Samoa 96799
NPDES Permit No. AS0000027

The public notice comment period will be from August 28, 1986 to September 29, 1986. Comments on the proposed action, or a request for a public hearing pursuant to 40 CFR 124.12, may be submitted to this office within 30 days following the date of this public notice. Comments or requests for public hearings should be sent to the above address, attention: Patrick Chan, Permits Record Controller (W-5-1).

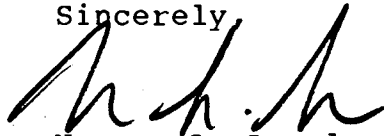
If the Regional Administrator finds a significant degree of public interest exists with respect to the proposed permit, a public hearing shall be held. If no hearing is held, we expect to forward the permit containing the final determinations of the Regional Administrator shortly after the close of the 30-day comment period.

If you have any questions regarding the technical nature of the draft permit, please call Madonna Narvaez at (415) 974-7427.

298A

If you have any questions regarding the administrative procedures of the permit issuance process, please call Danny Collier at (415) 974-7432.

Sincerely,

A handwritten signature in dark ink, appearing to read 'N. L. Lovelace', written in a cursive style.

Norman L. Lovelace, Chief
Office of Territorial Programs
Water Management Division

Enclosures

cc: Pati Faiai, Environmental Quality Commission
U.S. Army Corp of Engineers, HI
U.S. Fish and Wildlife Service, HI
U.S. National Marine Fisheries Service, HI
U.S. Dept. of Interior, HI
U.S. Navy, HI

PS Form 3811, July 1983 447-845 *Endangered Species* DOMESTIC RETURN RECEIPT

SENDER: Complete items 1, 2, 3 and 4.

Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for service(s) requested.

- ☒ Show to whom, date and address of delivery.
- ☐ Restricted Delivery.

3. Article Addressed to:
*Eugene Nitta, Protected Species
 PROGRAM COORDINATOR
 NATIONAL MARINE FISHERIES SERVICE
 P.O. BOX 3830
 Honolulu, HI 96812*

4. Type of Service: Article Number

<input type="checkbox"/> Registered	<input type="checkbox"/> Insured	7017 638 371
<input checked="" type="checkbox"/> Certified	<input type="checkbox"/> COD	
<input type="checkbox"/> Express Mail		

Always obtain signature of addressee or agent and **DATE DELIVERED.**

5. Signature - Addressee
 X *J. Davis*

6. Signature - Agent
 X

7. Date of Delivery
9-17-86

8. Addressee's Address (ONLY if requested and fee paid)

P 017 638 371

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
 NOT FOR INTERNATIONAL MAIL

(See Reverse)

★ U.S.G.P.O. 1984-446-014

Sent to <i>Eugene Nitta</i>	
Street and No.	
P.O., State and ZIP Code	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to whom and Date Delivered	
Return receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date	
21 AUG 1986	

PS Form 3800, Feb. 1982

21 AUG 1986

Mr. Eugene Nitta
Protected Species Program Coordinator
Western Pacific Program
National Marine Fisheries Service
P.O. Box 3830
Honolulu, Hawaii 96812

Dear Mr. Nitta:

As required by Section 7(a)(2) of the Endangered Species Act of 1973, as amended, we are requesting a list of any endangered or threatened species or critical habitats that may be present in the areas affected by our proposal to reissue NPDES permits for the following tuna canneries in American Samoa:

Star-Kist Samoa Inc.
Samoa Packing Company

Enclosed is a description of the discharges to be permitted, the receiving water conditions, and a draft permit and fact sheet for each facility. The information contained in these documents should help you to assess potential impacts to any endangered or threatened species.

Please notify us of your findings. Should your staff need further information, please have them contact Madonna Narvaez of the Permits and Pretreatment Section at (FTS) 454-7427.

Sincerely,

Original Signed by:
Frank M. Covington
Frank M. Covington
Director, Water Management Division

Enclosures

cc: Norm Lovelace, OTP
Pati Faiai, AS EQC
Frank Hackmann, Ralston Purina Co.
Jeffrey Nauman, Star-Kist

0300

CONCURRENCES

SYMBOL	W-5-1	W-5-1	W-5	OTP W-1-1	W1		
SURNAME	Narvaez	Euteneier	Euteneier	Collier	Collier		
DATE	8/13/86	8/13/86	8/14/86	8/14/86	8/15/86		

for 0000027

Mr. William Kramer
Section 7 Coordinator
U.S. Fish and Wildlife Service
300 Ala Moana Blvd., Rm. 6307
P.O. Box 50167
Honolulu, Hawaii 96858

Dear Mr. Kramer:

As required by Section 7(a)(2) of the Endangered Species Act of 1973, as amended, we are requesting a list of any endangered or threatened species or critical habitats that may be present in the areas affected by our proposal to reissue NPDES permits for the following tuna canneries in American Samoa:

Star-Kist Samoa Inc.
Samoa Packing Company

Enclosed is a description of the discharges to be permitted, the receiving water conditions, and a draft permit and fact sheet for each facility. The information contained in these documents should help you to assess potential impacts to any endangered or threatened species.

Please notify us of your findings. Should your staff need further information, please have them contact Madonna Narvaez of the Permits and Pretreatment Section at (FTS) 454-7427.

Sincerely,
Original Signed by:
Frank M. Covington
Frank M. Covington
Director, Water Management Division

Enclosures

cc: Norm Lovelace, OTP
Pati Faiai, AS EQC
Frank Hackmann, Ralston Purina Co.
Jeffrey Nauman, Star-Kist

0301

P 017 638 373

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

(See Reverse)

★ U.S.G.P.O. 1984-446-014 PS Form 3800, Feb. 1982	Sent to Dati Farai	
	Street and No.	
	P.O., State and ZIP Code	
	Postage	\$
	Certified Fee	
	Special Delivery Fee	
	Restricted Delivery Fee	
	Return Receipt Showing to whom and Date Delivered	
	Return receipt showing to whom, Date, and Address of Delivery	
	TOTAL Postage and Fees	\$
	Postmark or Date	

In Reply Please Refer
to Mail Code: (W-1-1)

21 AUG 1986

Pati Faiai
Executive Secretary
Environmental Quality Commission
American Samoa Government
Pago Pago, American Samoa 96799

Dear Mr. Faiai:

We propose to issue a National Pollutant Discharge Elimination System (NPDES) permit to the following discharger whose application we have determined to be complete:

Samoa Packing Company
P.O. Box 957
Pago Pago, American Samoa 96799
NPDES Permit No. AS0000027

Please review the enclosed draft permit and provide us with your certification, or denial of certification, in accordance with 40 CFR 124.53. Your certification should indicate whether the terms and conditions of the proposed permit will result in compliance with the applicable provisions of Sections 208(e), 301, 302, 303, 306 and 307 of the Clean Water Act of 1977 and with appropriate requirements of Territory law. You should also specify any permit conditions which must be made more stringent in order to meet the requirements of the Clean Water Act or Territory law, and any permit conditions which may be made less stringent without violating the requirements of Territory law, including water quality standards. Failure to provide such certification within 60 days from the date the draft permit is mailed shall be deemed a waiver of the right to certify any term or condition which may be established during the EPA permit issuance process.

Comments from interested persons and agencies will be received for a period of thirty (30) days following the public notice. If the response to the public notice indicates a significant degree of public interest in a public hearing, the Regional Administrator shall hold a public hearing in accordance with 40 CFR 124.12. We shall forward to you copies of any comments received by our office which concern certification, and we request that you send to us copies of any comments that you may receive regarding the proposed action.

CONCURRENCES						
SYMBOL	W-5-1	W-5-1	W-5	W-1-1 OPA		
SURNAME	Nawag	Sutherland	Sutherland	copy for Lovelace		0302
DATE	8/13/86	8/14/86	8/14/86	8/15/86		

If your staff has any questions regarding the draft permit, they should contact Danny Collier at (415) 974-7432.

Sincerely,

Norman L. Lovelace, Chief
Office of Territorial Programs
Water Management Division

Enclosure

0303

CONCURRENCES

SYMBOL							
SURNAME							
DATE							

0 5 AUG 1986

Frank Hackmann
Associate Counsel (T-9)
Ralston Purina Company
Checkerboard Square
St. Louis, Missouri 63164

SUBJECT: DRAFT NPDES PERMIT NO. AS0000027

Dear Mr. Hackmann:

Enclosed for your review are copies of portions of the draft National Pollutant Discharge Elimination System (NPDES) permit as well as the fact sheet for this permit. Only Parts I.A., I.B., and Part III of the permit are included with this package. The other parts of the permit have not changed since our meeting on June 12, 1986.

We have reserved 10:00 a.m., Monday, August 11, 1986 for a meeting to discuss the permit should you have any further questions or comments after reviewing the package. Representatives from EPA's Permits and Compliance Branch and Office of Territorial Programs as well as Mr. Pati Faiai of the American Samoa Environmental Quality Council will be available for the meeting.

If you wish to cancel this meeting, or need further information, please contact Madonna Narvaez of the Permits and Pretreatment Section at (415) 974-7427.

Sincerely,

William H. Pierce
Chief, Permits and Compliance Branch

Enclosures

cc: Norm Lovelace, OTP

DHL Airbill No. 35534074

0311

CONCURRENCES

SYMBOL	W-5-1	W-5-1	OTP/w	4-5				
SURNAME	Narvaez	Sutherland	Lovelace	NP				
DATE	8-5-86	8/5/86	8/5/86	8/5/86				



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

215 Fremont Street
San Francisco, Ca. 94105

Frank Hackmann
Associate Counsel (T-9)
Ralston Purina Company
Checkerboard Square
St. Louis, Missouri 63164

SUBJECT: DRAFT NPDES PERMIT NO. AS0000027

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If you wish to cancel this meeting, or need further information, please contact Madonna Narvaez of the Permits and Pretreatment Section at (415) 974-7427.

Sincerely,

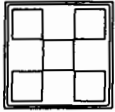
A handwritten signature in cursive script, appearing to read "William H. Pierce".

William H. Pierce
Chief, Permits and Compliance Branch

Enclosures

0312

2-18
A large, stylized handwritten mark, possibly a signature or a large "X", with the number "2-18" written above it.



Ralston Purina
Company

June 10, 1986

Mr. Kenneth Sutherland
U.S. Environmental Protection Agency
Region IX
215 Fremont Street
San Francisco, CA 94105

Re: Proposed Permit Renewal - NPDES Discharge Permit - Samoa
Packing Company - AS0000027

Dear Mr. Sutherland:

In accordance with our meeting held May 30, I am pleased to offer the following preliminary comments on the proposed NPDES Discharge Permit for Samoa Packing Company.

We concur with EPA's determination regarding best conventional technology. We are willing to accept the limitations on TSS and oil and grease. The PH and temperature limits should be unchanged from the current permit.

With regard to the other provisions of the draft permit, the most important one is determination of compliance with water quality standards. As we discussed in our meeting, it is our position that the Pago Pago Harbor is in compliance with the applicable water quality standards. The compliance methodology outlined by the Corp of Engineers in its 1980 study of treating all harbor sampling monitoring stations as a single data point for purposes of compliance determination shows compliance, in our opinion. Because this methodology was the existing methodology at the time of adoption of the 1981 standards, it is our position that any change in compliance methodology is, in effect, a change in the standards which cannot be done without appropriate public notice and comment. We do not feel this state of affairs was changed by the EPA's review of the standards of 1984. Because the standards are next scheduled for their triannual review in 1987, because of our contention that the harbor is in compliance, and further because we have been working on the joint water quality study with the Samoan government and Starkist, we suggest that the compliance schedule be modified in the proposed permit to require two years of additional data gathering at the same sampling stations used previously.

The compliance schedule should also require barging to sea of all press water and cooker juice in as expeditious a time frame as feasible, but not to exceed twelve months. We suggest that the data showing the impact of the ocean dumping of press water and cooker juice by the two canners be evaluated for the two year monitoring time frame. After that, the American Samoan government, in consultation with the canners and the EPA, can make a determination of what, if any, further changes are necessary.

0313

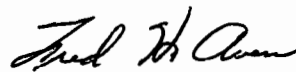
Mr. Kenneth Sutherland
June 10, 1986
Page Two

We believe this approach is completely consistent with the objective of both the American Samoan government and the U.S. EPA.

Because we believe the harbor now meets the standards, using the previously approved methodology, no "mixing zone" determination is now necessary. Our other comments regarding the proposed permit at this time center on the requirement for additional sampling of harbor bottoms, for reporting changes in concentrations, and for computing monthly averages where fewer than four data points are taken. We believe the existing permit language should be retained on these issues.

We also believe the proposed monitoring schedules are too stringent, and recommend existing schedules be maintained. We look forward to meeting with you June 12 to discuss these issues in further detail.

Sincerely,



Fred H. Avers
Division Vice President and
Director of Production
314-982-4003

plp

cc Mr. William H. Pierce, EPA
Ms. Patricia D. Eklund, EPA
Mr. Norman L. Lovelace, EPA
Mr. Danny Collier, EPA
Mr. Manley Sarnowsky, Samoa Packing Co.
Mr. Pati Faiai, EQC

0314



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

215 Fremont Street
San Francisco, Ca. 94105

Frank Hackman
Associate Counsel (T-9)
Ralston Purina Company
Checkerboard Square
St. Louis, Missouri 63164

29 MAY 1986

SUBJECT: MEETING TO DISCUSS PERMITS FOR AMERICAN SAMOA

Dear Mr. Hackman:

In preparation for our meeting on Friday, May 30, I am enclosing copies of the draft Ocean Dumping Permit and the draft National Pollution Discharge Elimination System Permit for your review. Representatives from EPA's Permits and Compliance Branch and the Office of Territorial Programs, as well as Mr. David Ballands and Mr. Jeffrey Naumann of Star-Kist Foods, will be at the 10:00 am meeting.

We will be discussing the relationship between the two American Samoa permits and the clean up of Pago Pago Harbor, specific factors related to each permit, and a time frame for permit issuance.

We are looking forward to a very productive meeting.

Sincerely,

A handwritten signature in cursive script, reading "William H. Pierce".

William H. Pierce

Chief, Permits and Compliance Branch

Enclosures

0315

ROUTING AND TRANSMITTAL SLIP

Date

3/17/86

TO: (Name, office symbol, room number, building, Agency/Post)

Initials

Date

1. Bill Pierce

BP

3/19

2. Pat Eklund - last

3. L. Sutherland

LS

3/20

4.

5.

Action	File	Note and Return
Approval	For Clearance	Per Conversation
As Requested	For Correction	Prepare Reply
Circulate	For Your Information	See Me
Comment	Investigate	Signature
Coordination	Justify	

REMARKS

Please advise ^{me} if you'll be able
give drafts to Lovelace as
requested.

DO NOT use this form as a RECORD of approvals, concurrences, disposals, clearances, and similar actions

FROM: (Name, org. symbol, Agency/Post)

Room No.—Bldg.

Lovelace

Phone No.

5041-102

★ U.S.GPO:1985-0-461-274/20011

OPTIONAL FORM 41 (Rev. 7-76)

Prescribed by GSA
FPMR (41 CFR) 101-11.206

To : Bill Pierce
Ken Sutherland
Pat Eklund

Fr : Norm Lovelace

3/17/86

Ref : A. Samoa Cannery Permits.

As a reminder, Danny Collier and myself are planning to be in A. Samoa for the week of April 7. Per our previous discussions, we would like to hand carry the draft NPDES and MPRSA permits with us and public notices. My present understanding is that the NPDES package is ready and a MPRSA research permit is being drafted.

Please let Donny or me know if there will be any difficulty in having the permits ready by the above time. We would like to review the draft MPRSA permit before April 6 so that we may offer our comments and suggestions.



AMERICAN SAMOA GOVERNMENT
PAGO PAGO, AMERICAN SAMOA 96799
DEPARTMENT OF PUBLIC WORKS

In reply refer to:
Serial-217

January 23, 1986

Mr. Norman L. Lovelace
Chief, Office of Territorial Programs
U.S. Environmental Protection Agency
Region IX
215 Fremont Street
San Francisco CA 94105

RE: Clarification of Water Quality Standards (WQS)

Dear Mr. Lovelace:

The Joint Study Final Draft will be distributed to the three principals in early February. A meeting of the principals will follow at which time a lively discussion is anticipated on the different interpretations of the WQS as discussed in your September 29, 1985 letter to Lyle Richmond.

Although CHM2-Hill has recently been made aware of your thoughts on this matter, it was felt that the draft report is too far along to debate the issue at this time. ASG will need to clarify this issue and is requesting your assistance on interpreting a third method of determining WQS compliance as spelled out in the American Samoa Water Quality Monitoring Handbook. Enclosed for your review and comment are the relevant pages, which basically says: similar stations data should be grouped together, i.e. inner Pago Pago Harbor, points 11, 12, 13. and outer Pago Pago Harbor, points 6, 7, 8, 9, 10. This method seems to be half way between blending all points together and looking at each and every point by itself.

The WQS define the criteria and procedures to establish a zone of mixing, but the definition as defined on page 15 (g) is hard to apply at the local level of government. I agree with your statement that "...useful for EQC to adopt a statement which specifies the monitoring protocol and data analysis process.... to judge whether the WQS are being achieved....".

Please provide your thoughts on this and perhaps a draft statement that I could begin talking to EQS about adopting.

Sincerely,

0338



Ralston Purina
Company

October 8, 1985

RECEIVED
U.S. EPA
REGION 9
COMM. CENTER

'85 OCT 10 A11:01

Mr. Frank Covington
Director, Waste Management Division
U.S. EPA, Region XI
215 Fremont Street
San Francisco, CA 94105

Dear Mr. Covington:

Re: Your letter dated 8/1/85 received 8/5/85
NPDES AS0000027, Permit Renewal Application
Samoa Packing Company - Updated Information

Under separate cover, we are sending directly to Mr. Paul Gjording the updated monthly loading information, to the extent analytical data are available for the months of March, April, May, June, July and August 1985. Please advise of any questions. Thank you very much.

Sincerely,

RALSTON PURINA COMPANY

Frank H. Hackmann
Associate Counsel
Environment and Energy
(314) 982-2619

cc Mr. Pati Faiyai - EQC (w/att.)
Mr. Robert Lemke - Samoa Packing Company (w/att.)
Mr. Danny Collier - EPA (w/o att.)
Mr. Paul Gjording - EPA (w/att.)

kms

0316

Samoa Packing Company

NPDES: AS0000027

Data Summary BOD₅, TKN, and P

(March, 1985 through August, 1985)

COMPUTATION: = Flow (MGD) * Conc (mg/l) * 8.345 = Pounds/Day

<u>Sampling Date</u>	<u>Flow MGD</u>	<u>BOD₅ Loading Pounds</u>	<u>TKN Loading Pounds</u>	<u>P Loading Pounds</u>
[Cannery Shutdown mid-August, 1984 through mid-March, 1985]				
3-21-85	.364	-	1102.6 (Ave. of 2 samples)	96.9
4-19-85	.456	-	1149.2	19.4
5-30-85	.520	-	-	20.7
6-26-85	.576	-	1595.8	29.1
7-31-85	.529	-	529.7	17.0
8-13-85	.496	-	663.4	26.9
8-14-85	.540	-	660.9	40.3
8-15-85	.548	-	782.0 (Ave. of samples if more than one analysis done.)	40.0

● Because of insufficient sample size, not all tests could be run.

● Because of sample condition as received at analytical lab, all results are questionable and cannot be guaranteed correct.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

215 Fremont Street
San Francisco, Ca. 94105

SEP 29 1985

Mr. Lyle Richmond
Chairman
Environmental Quality Commission
Office of the Governor
American Samoa Government
Pago Pago, American Samoa 96799

Dear Mr. Richmond:

During the recent visit of Danny Collier and myself to American Samoa we had the opportunity to discuss the status of the Joint Study. Several issues came up during these discussions that I wish to address. The main area that I want to address is the apparent difference of interpretation on how to determine whether or not violations of the American Samoa water quality standards (WQS) exists in Pago Pago Harbor. I believe clarification of this matter is vital.

My understanding of the issue is that two different interpretations exists on determining WQS compliance. One interpretation is that the compliance status of WQS is ascertained by performing the specified statistical analysis on the data from all the monitoring stations in the inner harbor, outer harbor and transition zone collectively. And the other interpretation is that the compliance status is determined by considering the data from each point separately and that the compliance status is determined on a point-by-point basis. We maintain that the second interpretation is the only acceptable and reasonable way to interpret the WQS. We have several reasons for holding this view which are discussed below.

The principal difficulty we have with the first interpretation is that it is fundamentally contrary to the intent and purpose of the WQS. The WQS were developed to designate beneficial uses and prescribe standards necessary to maintain those uses for the "... waters of the Territory ...". The first interpretation has the effect of masking localized water quality problems by combining them with other areas that may have acceptable water quality. Thus, although a portion of the harbor is violating WQS while others are in compliance, the result would be that the entire harbor is erroneously judged to meet WQS. We do not believe this was, and is, the intent of the WQS. It certainly was not our intent in approving the WQS.

0339

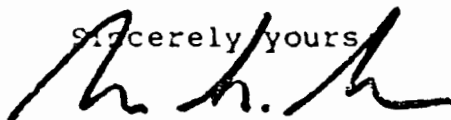
The first interpretation also is inconsistent with many provisions of the WQS. The provisions for granting of mixing zones and the associated prohibitions (e.g., not allowed within 500 feet of Goat Island Point) suggests that the WQS are intended to apply to every point in the harbor. Mixing zones are designed to provide for localized, alternate standards within the zone (under stringent conditions) to reflect the physical and practical realities of treatment technologies. In some ways the first approach would define the entire harbor as a mixing zone, which is clearly contrary to the WQS.

I believe some of the confusion over this issue comes from some of the documents that were prepared during WQS development. These documents describe suggested monitoring programs and data analyses to evaluate water quality. And in several places they suggest procedures that tend to support the first interpretation. However, I believe these documents were designed to serve a purpose other than making specific regulatory decisions regarding compliance with the WQS. I think the programs set forth in the documents are useful aids in making overview evaluations of water quality and providing an information base for future reviews and revisions of the WQS. But I do not believe they were intended or designed for the purpose of making localized and specific decisions regarding WQS compliance. Also, the documents are not referenced in the WQS themselves and would not seem to have any regulatory status.

At this point, I believe it would be useful for the Environmental Quality Commission (EQC) to consider this matter and adopt a statement of clarification. I do not think such a statement should be considered (at least on our part) as a formal revision to the existing WQS. It would also be useful for the EQC to adopt a statement which specifies the monitoring protocol and data analysis process that would be accepted as a means to judge whether the WQS are being achieved at any particular point. We would be happy to work with you and your staff on such a statement.

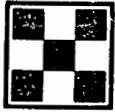
Please contact Danny Collier or myself if you have any questions or would like to discuss this matter in greater detail.

Sincerely yours



Norman L. Lovelace
Chief, Office of Territorial Programs

0340



Ralston Purina
Company

August 19, 1985

Mr. Frank M. Covington
Director, Waste Management Division
U.S. EPA, Region IX
215 Fremont Street
San Francisco, CA 94105

Dear Mr. Covington:

Your Letter Dated 8/1/85,
Received 8/5/85,
NPDES AS 0000027
Permit Renewal Application
Samoa Packing Company

Your recent request to Mr. Avers has been referred to me for handling. The information requested has been sent directly to Mr. Paul Gjording under separate cover. Please advise of any questions. Thank you very much.

Sincerely,

RALSTON PURINA COMPANY

Frank H. Hackmann
Associate Counsel
Environment and Energy
(314) 982-2619

cc Mr. Pati Faii - EQC (w/att.)
Mr. Robert Lemke - Samoa Packing Company (w/att.)
Mr. Danny Collier - EPA (w/o att.)
Mr. Paul Gjording - EPA (w/att.)

kms

0318

Samoa Packing Company
NPDES: AS 0000027

Data Summary - BOD₅, TKN and P
Mass Loadings - Pounds/Day
(September, 1982 through July, 1984)

Computation: = Flow (MGD) * Conc. (mg/l) * 8.345 = Pounds/Day

<u>Sampling Date(s)</u>	<u>Flow</u>	<u>BOD₅ Loading</u>	<u>TKN Loading</u>	<u>P Loading</u>
9-16-82	.496	816	3373.3	124.2
10-18-82	.408	1204	4099.3	25.5
11-26-82	.444	896	3320.6	38.7
12-23-82	.432	136	488.9	43.3
1-26-83	.488	1266	5155.6	32.2
2-15-83	.396	1352	4467.8	44.6
3-29-83	.420	1290	4521.3	163.0
4-14-83	.524	2018	8824.3	2.2
5-24-83	.572	1725	8232.1	24.8
6-14-83	.416	1759	6108.1	41.7
7-23-83	.364	1667	5063.9	33.4
8-25-83	.360	1290	3875.4	22.2
September, 1983 - Sampling dates not available - No computation done.				
10-7-83	.492	No concentration data available.		
November, 1983 - Sampling dates not available - No computation done.				
12-12-83	.404			
Average of two December sampling dates.	.396	--	1910.7	96.8
12-30-83	.388			
1-13-84	.444	1414	5239.5	85.4
2-17-84	.368	1416	4348.8	39.2
3-24-84	Plant down - No flow recorded on summary sheet.			
4-25-84	.388	--	1369.0	58.3

<u>Sampling Date(s)</u>	<u>Flow</u>	<u>BOD₅ Loading</u>	<u>TKN Loading</u>	<u>P Loading</u>
5-16-84	.368			
5-21-84	.416			
Average of three May sampling dates.	.393 2609	8553.2	1423.3	4.4
5-23-84	.396			
6-14-84	.400			
6-26-84	.436	No concentration data for June.		
6-28-84	.444			
7-24-84	.400	No concentration data for July.		

Notes:

1. Cannery shutdown for modification on 8-14-84.
2. Cannery commenced limited restart in March, 1985. Data collected after restart is not included, but will be sent under separate cover once it is all available.
3. Months for which there is no concentration data/sample dates are so listed.
4. In months with more than one "Sampling Date" shown, the average flow of those days only was used to compute loadings.
5. Some data points appear "out of line" as either "too high" or "too low".

0320

AUG 01 1985

Fred H. Avers, Vice President
 Ralston Purina Company
 Checkerboard Square
 St. Louis, Missouri 63164

re: NPDES Permit Application for Samoa Packing Company Tuna Cannery

Dear Mr. Avers:

I am writing to confirm a telephone conversation of July 22, 1985 between James Wass of your firm and Paul Gjording of my staff regarding your application for an NPDES permit for the Samoa Packing Company Tuna Cannery.

At that time, we reiterated our request of October 3, 1984 for a complete application for NPDES permit No. AS0000027. Specifically, Mr. Gjording mentioned that the application lacked daily maximum and monthly average pollutant mass loadings in the plant discharge for BOD, total nitrogen, and total phosphorus. Although you report concentrations for these pollutants in your monthly DMR's, it is impossible to calculate the mass loadings without the discharge flow rates recorded on the day of the sampling. No substantive progress can be made on your permit without this information.

Pursuant to federal regulations found at 40 CFR 124.3 (d), EPA may deny a permit and take appropriate enforcement actions, if the applicant fails to correct deficiencies in the permit application.

Please provide this information within fifteen days. If you have any questions regarding this matter, please have your staff contact Mr. Gjording at (415) 974-7367, or Mr. Danny Collier at (415) 974-7432.

Sincerely,
 ORIGINAL SIGNED BY:
 RICHARD E. REAVIS

0321

Frank M. Covington
 Director, Water Management Division

cc: Danny Collier, OTP

CONCURRENCES

SYMBOL	W-51	W-5-1	OTP	W-5	W-1		
SURNAME	Gjording	Sutherland	LeBretton	W	Reavis		
DATE	7/31/85	7/31/85	7/31/85	7/31/85	7/31/85		

Run # 2
Samoa Packing~~UPLUME~~ Tuna Canned
0 1 0

0.019	1	0.152	0.0	26.
0.0	0.0	0.0		
10	0.0	26.6		
0.	35.0	27.5		
3.	35.5	27.4		
6.	35.5	27.4		
9.	35.5	27.4		
12.	35.6	27.3		
15.	35.7	27.3		
18.	35.8	27.3		
21.	35.8	27.2		
24.	35.8	27.2		
27.	35.8	27.1		

Run # 2

CASE I.D.

~~UTILE~~ Cannery

Run #2

Samoa Packing

PRINTOUT INTERVAL

= 3.

(DEFAULT)

INITIAL TEMPERATURE OF THE PLUME = 26.60 DEGREES CENTIGRADE

INITIAL SALINITY OF THE PLUME = 0.00 PPT

INITIAL DENSITY OF THE PLUME = 0.99668 GM/CC

DISCHARGE VELOCITY = 1.047 M/S

FROUDE NUMBER = 5.2

DEPTH (M) SALIN (PPT) TEMP (C) SIGMAT

0.00 35.00 27.50 22.58

3.00 35.50 27.40 22.99

6.00 35.50 27.40 22.99

9.00 35.50 27.40 22.99

12.00 35.60 27.30 23.10

15.00 35.70 27.30 23.17

18.00 35.80 27.30 23.25

21.00 35.80 27.20 23.28

24.00 35.80 27.20 23.28

27.00 35.80 27.10 23.31

TOTAL EFFLUENT FLOW = 0.0190 CMS

NUMBER OF PORTS = 1

PORT DIAMETER = 0.152 M

PORT SPACING = 1000.0 M(DEFAULT)

VERTICAL PORT ANGLE FROM HORIZONTAL = 0.0 DEGREES

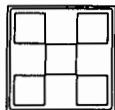
PORT DEPTH = 26.00 M

T (SEC)	S (M)	X (M)	Z (M)	DIA (M)	H (M)	THETA (DEG)	FLUX-AVE DILUTION
5.24	3.67	2.57	23.71	1.13	2.29	70.6	12.86
12.03	6.66	3.22	20.79	2.05	5.21	81.5	35.03
19.72	9.58	3.56	17.90	2.95	8.10	84.8	64.10
28.62	12.58	3.79	14.90	3.88	11.10	86.2	98.98
38.60	15.59	3.97	11.90	4.80	14.10	86.9	134.49
50.06	18.59	4.13	8.90	5.73	17.10	86.9	
63.92	21.60	4.30	5.90	6.65	20.10	86.6	
80.81	24.61	4.49	2.90	7.58	23.10	86.1	
98.47	26.68	4.76	0.86	8.22	25.14	0.0	

COMPUTATIONS CEASE: PLUME TRAJECTORY IS HORIZONTAL

TRAPPING LEVEL = 10.04 M BELOW WATER SURFACE.

AVERAGE DILUTION = 153.5



Ralston Purina
Company

September 27, 1984

Mr. Mike Flachsbart
Coordinator
NPDES Program - W-5-1
United States Environmental Protection
Agency - Region IX
215 Fremont Street
San Francisco, CA 94105

Re: NPDES Permit No. AS0000027
Request for Renewal and Modification

Dear Mr. Flachsbart:

Enclosed please find an application for permit renewal and modification for the tuna cannery operated in American Samoa by Samoa Packing Company, a wholly owned subsidiary of Ralston Purina Company.

The revised tonnage level for the new permit is 320 tons/day as outlined in our earlier letter dated March 20, 1984. The analytical data, and estimates of variation, are based on September, 1983 through May, 1984 DMR's submitted previously to the EPA, unless otherwise noted. To the extent that sample data from DMR's is unavailable (e.g. COD, TOC, ammonia, stormwater, etc.) we request a sampling waiver as these data are already available to the EPA from other sources.

In summary, we request the total mass loadings in the permit be revised upward to reflect the increase in tonnage from 225 to 320. In our best judgment, DAF operation in Samoa will be substantially "linear" over this production range, so the current effluent limits per 1000 pounds of fish can still be achieved. We believe these limits should be considered "BCT" as well. Please note we operate no fish solubles plant in Samoa.

Should you have any questions, or desire to meet on any of the topics addressed in this letter, please contact Mr. Frank Hackmann, Environmental and Energy Counsel (314/982-2619), or myself. Also, to facilitate communication, would you please mail to me a copy of any material you send to Mr. Lemke in Samoa. Thank you.

Sincerely,

James J. Wass
Director, Division Engineering
and Environmental Affairs
(314) 982-1663

cc: Mr. Norman Lovelace, U.S. EPA (w/att.)
Mr. Patti Fai'ai - EQC (w/att.)
Mr. Robert Lemke - Samoa Packing Company

/swb

0440

Fill-in areas are spaced for elite type, i.e., 12 characters/inch. Form Approved, OMB No. 2000-0474, Expires 2-31-84

ENVIRONMENTAL PROTECTION AGENCY
GENERAL INFORMATION
Consolidated Permits Program
(Read the "General Instructions" before starting.)

FORM 1
GENERAL

I. EPA I.D. NUMBER
AS 000 0027

III. FACILITY NAME
SAMOA PACKING COMPANY

V. FACILITY MAILING ADDRESS
PAGO PAGO TUTUILA
PLEASE PLACE LABEL IN THIS SPACE
AMERICAN SAMOA 96799
SAME

VI. FACILITY LOCATION

GENERAL INSTRUCTIONS
If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete items I, III, V, and VI (except VI-8 which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS	MARK 'X'			SPECIFIC QUESTIONS	MARK 'X'		
	YES	NO	FORM ATTACHED		YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X		B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)	X			D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)		X		F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X		J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5) (See related correspondence)		X	

III. NAME OF FACILITY
1 SKIP SAMOA PACKING COMPANY

IV. FACILITY CONTACT
A. NAME & TITLE (last, first, & title)
2 LEMKE ROBERT VP & GEN MGR
B. PHONE (area code & no.)
684 633 5272

V. FACILITY MAILING ADDRESS
A. STREET OR P.O. BOX
3
B. CITY OR TOWN
4 PAGO PAGO TUTUILA
C. STATE
AS
D. ZIP CODE
96799

VI. FACILITY LOCATION
A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER
5
B. COUNTY NAME
Not Applicable
C. CITY OR TOWN
6 PAGO PAGO TUTUILA
D. STATE
AS
E. ZIP CODE
96799
F. COUNTY CODE (if known)

VII. SIC CODES (4-digit, in order of priority)

A. FIRST										B. SECOND									
(specify) 7 2 0 9 1 Canned/Preserved Seafood (tuna)										(specify) 7									
C. THIRD										D. FOURTH									
(specify) 7										(specify) 7									

VIII. OPERATOR INFORMATION

A. NAME																														B. Is the name listed in Item VIII-A also the owner?																			
8 S A M O A P A C K I N G C O M P A N Y, subsidiary R A L S T O N P U R I N A																														YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>																			
C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)																														D. PHONE (area code & no.)																			
F = FEDERAL S = STATE P = PRIVATE										M = PUBLIC (other than federal or state) O = OTHER (specify)										P (specify) 50										A 6 8 4 6 3 3 5 2 7 2 15 16 17 18 19 20 21 22 23 24																			
E. STREET OR P.O. BOX																																																	
F. CITY OR TOWN																														G. STATE					H. ZIP CODE					IX. INDIAN LAND									
B P A G O P A G O T U T U I L A																														A S					9 6 7 9 9					Is the facility located on Indian lands? YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>									

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)															D. PSD (Air Emissions from Proposed Sources)														
9 N A S 0 0 0 0 0 2 7															9 P A S 8 3 0 1														
B. UIC (Underground Injection of Fluids)															E. OTHER (specify)														
9 U															9 O D 7 9 0 1 1 0 2 (specify) (Pending renewal Ocean Dumping OD 8301/02)														
C. RCRA (Hazardous Wastes)															E. OTHER (specify)														
9 R															9 P O D C 0 1 5 9 6 5 (specify) Army Corps Engr. Wharf Addition														

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements. (Previously filed)

XII. NATURE OF BUSINESS (provide a brief description)

Fish are received dockside and unloaded to freezers at cannery. From freezers, fish are thawed, butchered, precooked, canned, retorted, cooled, labeled and cased. Scrap is processed in a fish meal plant. A modern, efficient DAF/Rotostrainer system provides wastewater treatment. DAF sludge is ocean dumped. Note, this cannery does not have a fish solubles plant.

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (Type or print) F. H. Avers, Div. V.P. and Director Production Operations										B. SIGNATURE <i>F. H. Avers</i>										C. DATE SIGNED 9/27/84									
--	--	--	--	--	--	--	--	--	--	------------------------------------	--	--	--	--	--	--	--	--	--	---------------------------	--	--	--	--	--	--	--	--	--

COMMENTS FOR OFFICIAL USE ONLY

C																													
---	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--

SEPA

I. OUTFALL LOCATION

[illegible][illegible]

0443

CONTINUED FROM THE FRONT

C. Except for storm runoff, leaks, or spills, are any of the discharges described in Items II-A or B intermittent or seasonal?

☐ YES (complete the following table)

☐ NO (go to Section III)

1. OUTFALL NUMBER <i>(list)</i>	2. OPERATION(s) CONTRIBUTING FLOW <i>(list)</i>	3. FREQUENCY		4. FLOW				c. DUR- ATION <i>(in days)</i>
		a. DAYS PER WEEK <i>(specify average)</i>	b. MONTHS PER YEAR <i>(specify average)</i>	a. FLOW RATE <i>(in mgd)</i>		b. TOTAL VOLUME <i>(specify with units)</i>		
				1. LONG TERM AVERAGE	2. MAXIMUM DAILY	1. LONG TERM AVERAGE	2. MAXIMUM DAILY	

III. MAXIMUM PRODUCTION 320 tons/day

A. Does an effluent guideline limitation promulgated by EPA under Section 304 of the Clean Water Act apply to your facility?

☒ YES (complete Item III-B)

☐ NO (to Section IV)

B. Are the limitations in the applicable effluent guideline expressed in terms of production (or other measure of operation)?

☒ YES (complete Item III-C)

☐ NO (go to Section IV)

C. If you answered "Yes" to Item III-B, list the quantity which represents an actual measurement of your maximum level of production, expressed in the terms and units used in the applicable effluent guideline, and indicate the affected outfalls.

1. MAXIMUM QUANTITY			2. AFFECTED OUTFALLS (list outfall numbers)
2. QUANTITY PER DAY	b. UNITS OF MEASURE	c. OPERATION, PRODUCT, MATERIAL, ETC. (specify)	
640	1000 lbs	Tuna canning - 1000 lbs/day fish processed basis	001

IV. IMPROVEMENTS

A. Are you now required by any Federal, State or local authority to meet any implementation schedule for the construction, upgrading or operation of waste-water treatment equipment or practices or any other environmental programs which may affect the discharges described in this application? This includes, but is not limited to, permit conditions, administrative or enforcement orders, enforcement compliance schedule letters, stipulations, court orders, and grant or loan conditions.

☐ YES (complete the following table)

☒ NO (go to Item IV-B) (Joint study underway)

1. IDENTIFICATION OF CONDITION, AGREEMENT, ETC.	2. AFFECTED OUTFALLS		3. BRIEF DESCRIPTION OF PROJECT	4. FINAL COM- PLIANCE DATE	
	a. NO.	b. SOURCE OF DISCHARGE		a. RE- QUIRED	b. PRO- JECTED
			with ASG and Star-Kist on Pago Pago Harbor water related issues		

B. OPTIONAL: You may attach additional sheets describing any additional water pollution control programs (or other environmental projects which may affect your discharges) you now have underway or which you plan. Indicate whether each program is now underway or planned, and indicate your actual or planned schedules for construction. ☐ MARK "X" IF DESCRIPTION OF ADDITIONAL CONTROL PROGRAMS IS ATTACHED

AS 0000027

CONTINUED FROM PAGE 2

V. INTAKE AND EFFLUENT CHARACTERISTICS

A, B, & C: See instructions before proceeding — Complete one set of tables for each outfall — Annotate the outfall number in the space provided.
NOTE: Tables V-A, V-B, and V-C are included on separate sheets numbered V-1 through V-9.

D. Use the space below to list any of the pollutants listed in Table 2c-3 of the instructions, which you know or have reason to believe is discharged or may be discharged from any outfall. For every pollutant you list, briefly describe the reasons you believe it to be present and report any analytical data in your possession.

1. POLLUTANT	2. SOURCE	1. POLLUTANT	2. SOURCE
None of the substances listed are used in the manufacturing process; however, this does not preclude one or more of them from being present in trace concentrations in either influent or effluent waters.			

VI. POTENTIAL DISCHARGES NOT COVERED BY ANALYSIS

A. Is any pollutant listed in Item V-C a substance or a component of a substance which you do or expect that you will over the next 5 years use or manufacture as an intermediate or final product or byproduct?

☐ YES (list all such pollutants below)☒ NO (go to Item VI-B)

B. Are your operations such that your raw materials, processes, or products can reasonably be expected to vary so that your discharges of pollutants may during the next 5 years exceed two times the maximum values reported in Item V?

☐ YES (complete Item VI-C below)☒ NO (go to Section VII)

C. If you answered "Yes" to Item VI-B, explain below and describe in detail the sources and expected levels of such pollutants which you anticipate will be discharged from each outfall over the next 5 years, to the best of your ability at this time. Continue on additional sheets if you need more space.

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VII. BIOLOGICAL TOXICITY TESTING DATA

Do you have any knowledge or reason to believe that any biological test for acute or chronic toxicity has been made on any of your discharges or on a receiving water in relation to your discharge within the last 3 years?

☐ YES (identify the test(s) and describe their purposes below)

☒ NO (go to Section VIII)

VIII. CONTRACT ANALYSIS INFORMATION

Were any of the analyses reported in Item V performed by a contract laboratory or consulting firm?

☐ YES (list the name, address, and telephone number of, and pollutants analyzed by, each such laboratory or firm below)

☒ NO (go to Section IX)

A. NAME	B. ADDRESS	C. TELEPHONE (area code & no.)	D. POLLUTANTS ANALYZED (list)

IX. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)

F. H. Avers, Division Vice President and Director,
Production Operations

B. PHONE NO. (area code & no.)

(314) 982-4003

C. SIGNATURE

F. H. Avers

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D. DATE SIGNED

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PLEASE PRINT OR TYPE IN THE UNSHADED AREAS ONLY. You may report some or all of this information on separate sheets (use the same format) instead of completing these pages. SEE INSTRUCTIONS.

V. INTAKE AND EFFLUENT CHARACTERISTICS (continued from page 3 of Form 2-C)

Note: COD, TOC and Ammonia Data Filed Previously with EPA. Data based on 9/83 to 5/84 DMR

OUTFALL NO.

001

PART A - You must provide the results of at least one analysis for every pollutant in this table. Complete one table for each outfall. See instructions for additional details.

1. POLLUTANT	2. EFFLUENT						3. UNITS (specify if blank)		4. INTAKE (optional)			
	a. MAXIMUM DAILY VALUE		b. MAXIMUM 30 DAY VALUE (if available)		c. LONG TERM AVG. VALUE (if available)		d. NO. OF ANALYSES	a. CONCENTRATION	b. MASS	a. LONG TERM AVERAGE VALUE		b. NO. OF ANALYSES
	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS				(1) CONCENTRATION	(2) MASS	
a. Biochemical Oxygen Demand (BOD)	2608	---	Not available		1414	---	8 - (DMR's)	mg/l				
b. Chemical Oxygen Demand (COD)	---	---	---	---	---	---		---	---			
c. Total Organic Carbon (TOC)	---	---	---	---	---	---		---	---			
d. Total Suspended Solids (TSS)	286			156.4	117		(DMR's)	mg/l				
e. Ammonia (as N)	---	---	---	---	---	---						
f. Flow	VALUE .724		VALUE .439		VALUE .401 (9/83-5/84)			MGPD		VALUE		
g. Temperature (winter) (-May)	VALUE 84°F (ave.)		VALUE 80°F (ave.)		VALUE			°C		VALUE		
h. Temperature (summer) (Nov.)	VALUE 90°F (ave)		VALUE 84°F (ave)		VALUE N/A			°C		VALUE		
i. pH	MINIMUM 6.1	MAXIMUM 8.2	MINIMUM 6.0	MAXIMUM 8.4				STANDARD UNITS				

PART B - Mark "X" in column 2-a for each pollutant you know or have reason to believe is present. Mark "X" in column 2-b for each pollutant you believe to be absent. If you mark column 2-a for any pollutant, you must provide the results of at least one analysis for that pollutant. Complete one table for each outfall. See the instructions for additional details and requirements. NOTE: The Part A numbers are based on active experience at a nominal 225.

1. POLLUTANT AND CAP NO. (if available)	2. MARK 'X'		3. EFFLUENT						4. UNITS		5. INTAKE (optional)			
	a. BELIEVED PRESENT	b. BELIEVED ABSENT	a. MAXIMUM DAILY VALUE		b. MAXIMUM 30 DAY VALUE (if available)		c. LONG TERM AVG. VALUE (if available)		d. NO. OF ANALYSES	a. CONCENTRATION	b. MASS	a. LONG TERM AVERAGE VALUE		b. NO. OF ANALYSES
			(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS				(1) CONCENTRATION	(2) MASS	
a. Bromide (24958-67-9)		X	Ton/day capacity. An expansion to 320 tons/day is underway.											
b. Chlorine, Total Residual	X		The projected loading should be scaled upward accordingly, as the new capacity will be 320 tons/day in early 1985.											
c. Color	X													
d. Fecal Coliform	X													
e. Fluoride (16934-49-8)		X												
f. Nitrate-Nitrite (as N)	X		.268				.164		7	mg/l				

None of substances marked "believed absent" are used in the production process; however this does not preclude one or more of them from being present in trace concentrations in the discharge.

ITEM V-B CONTINUED FROM FRONT

1. POLLUTANT AND CAS NO. (if available)	2. MARK 'X'		3. EFFLUENT						4. UNITS		5. INTAKE (optional)			
	a. BELIEVED PRESENT	b. BELIEVED ABSENT	a. MAXIMUM DAILY VALUE		b. MAXIMUM 30 DAY VALUE (if available)		c. LONG TERM AVRG. VALUE (if available)		d. NO. OF ANALYSES	a. CONCENTRATION	b. MASS	a. LONG TERM AVERAGE VALUE		b. NO. OF ANALYSES
			(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS				(1) CONCENTRATION	(2) MASS	
g. Nitrogen, Total Organic (as N)	X		578.2	---	---	---	444.6	---	7	mg/l	---			
h. Oil and Grease	X		234.8	---	113.4		60.9	---	DMR's	mg/l	---			
i. Phosphorus (as P), Total (7723-14-0)	X		29.3	---	---	---	16.1	---	7	mg/l	---			
j. Radioactivity														
(1) Alpha, Total		X												
(2) Beta, Total		X												
(3) Radium, Total		X												
(4) Radium 226, Total		X												
k. Sulfate (as SO ₄) (14806-79-8)	X													
l. Sulfide (as S)	X													
m. Sulfite (as SO ₃) (14265-45-3)	X													
n. Surfactants														
o. Aluminum, Total (7429-90-5)	X													
p. Barium, Total (7440-39-3)		X												
q. Boron, Total (7440-42-8)		X												
r. Cobalt, Total (7440-48-4)		X												
s. Iron, Total (7439-89-6)	X													
t. Magnesium, Total (7439-95-4)		X												
u. Molybdenum, Total (7439-98-7)		X												
v. Manganese, Total (7439-96-5)		X												
w. Tin, Total (7440-31-5)		X												
x. Titanium, Total (7440-32-6)		X												

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CONTINUED FROM PAGE 3 OF FORM 2-C

PART C - If you are a primary industry and this outfall contains process wastewater, refer to Table 2c-2 in the instructions to determine which of the GC/MS fractions you must test for. Mark "X" in column 2-a for all such GC/MS fractions that apply to your industry and for ALL toxic metals, cyanides, and total phenols. If you are not required to mark column 2-a (*secondary industries, non-process wastewater outfalls, and non-required GC/MS fractions*), mark "X" in column 2-b for each pollutant you know or have reason to believe is present. Mark "X" in column 2-c for each pollutant you believe to be absent. If you mark either columns 2-a or 2-b for any pollutant, you must provide the results of at least one analysis for that pollutant. Note that there are seven pages to this part; please review each carefully. Complete one table (*all seven pages*) for each outfall. See instructions for additional details and requirements.

1. POLLUTANT AND CAS NUMBER (if available)	2. MARK 'X'			3. EFFLUENT						4. UNITS		5. INTAKE (optional)			
	a. TESTING REQUIRED	b. BELIEVED PRESENT	c. BELIEVED ABSENT	d. MAXIMUM DAILY VALUE		e. MAXIMUM 30 DAY VALUE (if available)		f. LONG TERM AVRG. VALUE (if available)		g. NO. OF ANALYSES	a. CONCENTRATION	b. MASS	h. LONG TERM AVERAGE VALUE		i. NO. OF ANALYSES
				(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS				(1) CONCENTRATION	(2) MASS	
METALS, CYANIDE, AND TOTAL PHENOLS															
1M. Antimony, Total (7440-36-0)			X												
2M. Arsenic, Total (7440-38-2)			X												
3M. Beryllium, Total (7440-41-7)			X												
4M. Cadmium, Total (7440-43-9)			X												
5M. Chromium, Total (7440-47-3)			X												
6M. Copper, Total (7550-50-8)			X												
7M. Lead, Total (7439-92-1)			X												
8M. Mercury, Total (7439-97-6)			X												
9M. Nickel, Total (7440-02-0)			X												
10M. Selenium, Total (7782-49-2)			X												
11M. Silver, Total (7440-22-4)			X												
12M. Thallium, Total (7440-28-0)			X												
13M. Zinc, Total (7440-66-6)			X												
14M. Cyanide, Total (57-12-5)			X												
15M. Phenols, Total			X												
DIOXIN															
2,3,7,8-Tetra-chlorodibenzo-P-Dioxin (1764-01-6)			X	DESCRIBE RESULTS											

None of substances marked "believed absent" are used in the production process; however this does not preclude one or more of them from being present in trace concentrations in the discharge.

CONTINUED FROM THE FRONT

1. POLLUTANT AND CAS NUMBER (if available)	2. MARK 'X'			3. EFFLUENT						4. UNITS		5. INTAKE (optional)			
	A. TEST ING RE- QUIR- ED	B. BE- LIEVED PRE- SENT	C. BE- LIEVED AB- SENT	B. MAXIMUM DAILY VALUE		D. MAXIMUM 30 DAY VALUE (if available)		E. LONG TERM AVRG. VALUE (if available)		d. NO. OF ANAL- YSES	a. CONCEN- TRATION	b. MASS	a. LONG TERM AVERAGE VALUE		b. NO. OF ANAL- YSES
				(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS				(1) CONCEN- TRATION	(2) MASS	
GC/MS FRACTION - VOLATILE COMPOUNDS															
1V. Acrolein (107-02-9)			X												
2V. Acrylonitrile (107-13-1)			X												
3V. Benzene (71-43-2)			X												
4V. Bis (Chloro- methyl) Ether (542-88-1)			X												
5V. Bromoform (75-25-2)			X												
6V. Carbon Tetrachloride (56-23-5)			X												
7V. Chlorobenzene (108-90-7)			X												
8V. Chlorodi- bromomethane (124-48-1)			X												
9V. Chloroethane (75-00-3)			X												
10V. 2-Chloro- ethylvinyl Ether (110-75-8)			X												
11V. Chloroform (67-66-3)			X												
12V. Dichloro- bromomethane (75-27-4)			X												
13V. Dichloro- difluoromethane (75-71-8)			X												
14V. 1,1-Dichloro- ethane (75-34-3)			X												
15V. 1,2-Dichloro- ethane (107-06-2)			X												
16V. 1,1-Dichloro- ethylene (75-35-4)			X												
17V. 1,2-Dichloro- propane (78-87-5)			X												
18V. 1,3-Dichloro- propylene (542-75-6)			X												
19V. Ethylbenzene (100-41-4)			X												
20V. Methyl Bromide (74-83-9)			X												
21V. Methyl Chloride (74-87-3)			X												

1. POLLUTANT AND CAS NUMBER (if available)	2. MARK 'X'			3. EFFLUENT						4. UNITS		5. INTAKE (optional)			
	a. TESTING REQUIRED	b. BELIEVED PRESENT	c. BELIEVED ABSENT	a. MAXIMUM DAILY VALUE		b. MAXIMUM 30 DAY VALUE (if available)		c. LONG TERM AVG. VALUE (if available)		d. NO. OF ANALYSES	a. CONCENTRATION	b. MASS	b. LONG TERM AVERAGE VALUE		d. NO. OF ANALYSES
				(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS				(1) CONCENTRATION	(2) MASS	
GC/MS FRACTION - VOLATILE COMPOUNDS (continued)															
22V. Methylene Chloride (75-09-2)			X												
23V. 1,1,2,2-Tetrachloroethane (79-34-5)			X												
24V. Tetrachloroethylene (127-18-4)			X												
25V. Toluene (108-83-3)			X												
26V. 1,2-Trans-Dichloroethylene (156-60-5)			X												
27V. 1,1,1-Trichloroethane (71-55-6)			X												
28V. 1,1,2-Trichloroethane (79-00-5)			X												
29V. Trichloroethylene (79-01-6)			X												
30V. Trichlorofluoromethane (75-69-4)			X												
31V. Vinyl Chloride (75-01-4)			X												
GC/MS FRACTION - ACID COMPOUNDS															
1A. 2-Chlorophenol (95-57-8)			X												
2A. 2,4-Dichlorophenol (120-83-2)			X												
3A. 2,4-Dimethylphenol (105-67-9)			X												
4A. 4,6-Dinitro-O-Cresol (534-52-1)			X												
5A. 2,4-Dinitrophenol (51-28-5)			X												
6A. 2-Nitrophenol (88-75-5)			X												
7A. 4-Nitrophenol (100-02-7)			X												
8A. P-Chloro-M-Cresol (59-50-7)			X												
9A. Pentachlorophenol (87-86-5)			X												
10A. Phenol (103-95-2)			X												
11A. 2,4,6-Trichlorophenol (88-06-2)			X												

CONTINUED FROM THE FRONT

1. POLLUTANT AND CAS NUMBER (if available)	2. MARK 'X'			3. EFFLUENT						4. UNITS		5. INTAKE (optional)			
	a. TEST- ING RE- QUIR- ED	b. BELIEVED PRE- SENT	c. BELIEVED AB- SENT	8. MAXIMUM DAILY VALUE		b. MAXIMUM 30 DAY VALUE (if available)		c. LONG TERM AVG. VALUE (if available)		d. NO. OF ANAL- YSES	a. CONCENTRATION	b. MASS	8. LONG TERM AVERAGE VALUE		b. NO. OF ANAL- YSES
				(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS				(1) CONCENTRATION	(2) MASS	
GC/MS FRACTION - BASE/NEUTRAL COMPOUNDS															
1B. Acenaphthene (83-32-9)			X												
2B. Acenaphthylene (209-96-8)			X												
3B. Anthracene (120-12-7)			X												
4B. Benzidine (92-87-5)			X												
5B. Benzo (a) Anthracene (56-55-3)			X												
6B. Benzo (a) Pyrene (50-32-8)			X												
7B. 3,4-Benzo- fluoranthene (205-90-2)			X												
8B. Benzo (ghi) Perylene (191-24-2)			X												
9B. Benzo (h) Fluoranthene (207-08-9)			X												
10B. Bis (2-Chloro- ethoxy) Methane (111-91-1)			X												
11B. Bis (2-Chloro- ethyl) Ether (111-44-4)			X												
12B. Bis (2-Chloro- isopropyl) Ether (39638-32-9)			X												
13B. Bis (2-Ethyl- hexyl) Phthalate (67-81-7)			X												
14B. 4-Bromo- phenyl Phenyl Ether (101-55-3)			X												
15B. Butyl Benzyl Phthalate (85-58-7)			X												
16B. 2-Chloro- naphthalene (91-58-7)			X												
17B. 4-Chloro- phenyl Phenyl Ether (7005-72-3)			X												
18B. Chrysene (218-01-9)			X												
19B. Dibenzo (a,h) Anthracene (53-70-3)			X												
20B. 1,2-Dichloro- benzene (95-50-1)			X												
21B. 1,3-Dichloro- benzene (541-73-1)			X												

None of substances marked "believed absent" are used in the production process; however this does not preclude one or more of them from being present in trace concentrations in the discharge.

CONTINUED FROM PAGE V-6

1. POLLUTANT AND CAS NUMBER (if available)	2. MARK 'X'			3. EFFLUENT						4. UNITS		5. INTAKE (optional)			
	a. TEST-ING RE-QUIRED	b. BELIEVED PRE-SENT	c. RE-LIEVED AB-SENT	a. MAXIMUM DAILY VALUE		b. MAXIMUM 30 DAY VALUE (if available)		c. LONG TERM AVRG. VALUE (if available)		d. NO. OF ANAL-YES	a. CONCENTRATION	b. MASS	3. LONG TERM AVERAGE VALUE		b. NO. OF ANAL-YES
				(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS				(1) CONCENTRATION	(2) MASS	
GC/MS FRACTION - BASE/NEUTRAL COMPOUNDS (continued)															
22B. 1,4-Dichloro-benzene (106-46-7)			X												
23B. 3,3'-Dichloro-benzidine (91-83-1)			X												
24B. Diethyl Phthalate (84-66-2)			X												
25B. Dimethyl Phthalate (131-11-3)			X												
26B. Di-N-Butyl Phthalate (84-74-2)			X												
27B. 2,4-Dinitro-toluene (121-14-2)			X												
28B. 2,6-Dinitro-toluene (606-20-2)			X												
29B. Di-N-Octyl Phthalate (117-84-0)			X												
30B. 1,2-Diphenyl-hydrazine (as Azo-benzene) (122-66-7)			X												
31B. Fluoranthene (206-44-0)			X												
32B. Fluorene (86-73-7)			X												
33B. Hexa-chlorobenzene (118-71-1)			X												
34B. Hexa-chlorobutadiene (57-68-3)			X												
35B. Hexachloro-cyclopentadiene (77-47-4)			X												
36B. Hexachloro-ethane (67-72-1)			X												
37B. Indeno (1,2,3-cd) Pyrene (193-39-5)			X												
38B. Isophorone (78-59-1)			X												
39B. Naphthalene (91-20-3)			X												
40B. Nitrobenzene (98-95-3)			X												
41B. N-Nitro-sodimethylamine (62-75-9)			X												
42B. N-Nitrosodi-N-Propylamine (621-64-7)			X												

None of substances marked "believed absent" are used in the production process; however this does not preclude one or more of them from being present in trace concentrations in the discharge.

CONTINUED FROM THE FRONT

CONTINUED FROM THE FRONT															
1. POLLUTANT AND CAS NUMBER (if available)	2. MARK 'X'			3. EFFLUENT						4. UNITS		5. INTAKE (optional)			
	a. TEST- ING RE- QUIR- ED	b. BE- LIEVED PRE- SENT	c. BE- LIEVED AB- SENT	d. MAXIMUM DAILY VALUE		e. MAXIMUM 30 DAY VALUE (if available)		f. LONG TERM AVRG. VALUE (if available)		g. NO. OF ANAL- YSES	a. CON- CENTR- ATION	b. MASS	h. LONG TERM AVERAGE VALUE		i. NO. OF ANAL- YSES
				(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS				(1) CON- CENTR- ATION	(2) MASS	
GC/MS FRACTION - BASE/NEUTRAL COMPOUNDS (continued)															
43B. N-Nitro- sodiphenylamine (86-30-6)			X												
44B. Phenanthrene (85-01-3)			X												
45B. Pyrene (129-00-0)			X												
46B. 1,2,4 - Tri- chlorobenzene (120-82-1)			X												
GC/MS FRACTION - PESTICIDES															
1P. Aldrin (309-00-2)			X												
2P. α -BHC (319-84-6)			X												
3P. β -BHC (319-85-7)			X												
4P. γ -BHC (58-89-3)			X												
5P. δ -BHC (319-86-3)			X												
6P. Chlordane (57-74-9)			X												
7P. 4,4'-DDT (50-29-3)			X												
8P. 4,4'-DDE (72-55-9)			X												
9P. 4,4'-DDD (72-54-8)			X												
10P. Dieldrin (60-57-1)			X												
11P. α -Endosulfan (115-29-7)			X												
12P. β -Endosulfan (115-29-7)			X												
13P. Endosulfan Sulfate (1031-07-8)			X												
14P. Endrin (72-20-8)			X												
15P. Endrin Aldehyde (7421-93-4)			X												
16P. Heptachlor (76-44-8)			X												

None of substances marked "believed absent" are used in the production process; however this does not preclude one or more of them from being present in trace concentrations in the discharge.

EPA I.D. NUMBER (copy from Item 1 of Form 1) **OUTFALL NUMBER**
AS 0000027

Form Approved OMB No. 158-R0173

CONTINUED FROM PAGE V-8

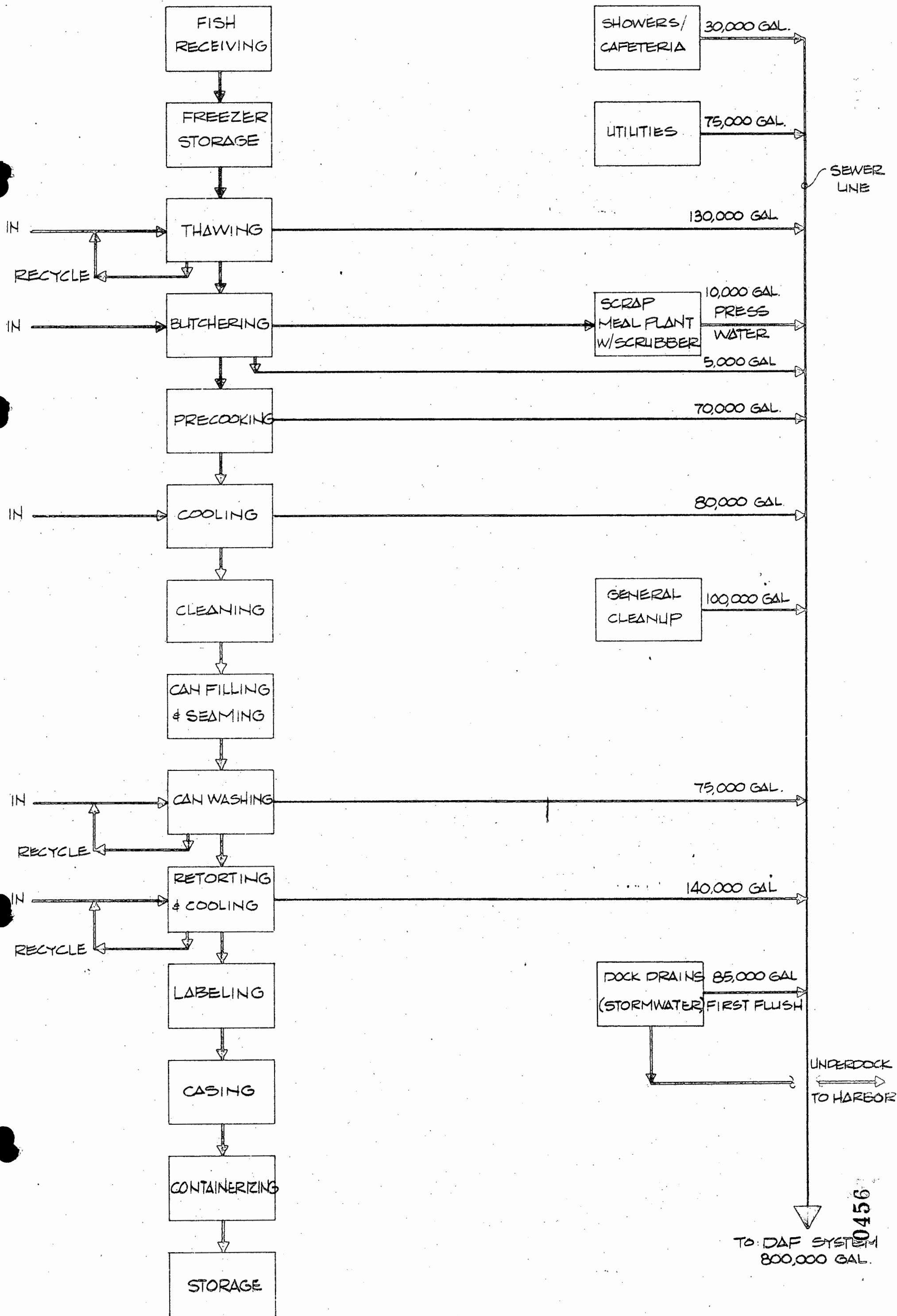
1. POLLUTANT AND CAS NUMBER (if available)	2. MARK 'X'			3. EFFLUENT						4. UNITS		5. INTAKE (optional)			
	a. TESTING REQUIRED	b. BELIEVED PRESENT	c. BELIEVED ABSENT	a. MAXIMUM DAILY VALUE		b. MAXIMUM 30 DAY VALUE (if available)		c. LONG TERM AVRG. VALUE (if available)		d. NO. OF ANALYSES	2. CONCENTRATION	b. MASS	3. LONG TERM AVERAGE VALUE		b. NO. OF ANALYSES
				(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS				(1) CONCENTRATION	(2) MASS	
GC/MS FRACTION - PESTICIDES (continue)															
17P. Heptachlor Epoxide (1024-57-3)			X												
18P. PCB-1242 (53459-21-9)			X												
19P. PCB-1254 (11097-69-1)			X												
20P. PCB-1221 (11104-23-2)			X												
21P. PCB-1232 (11141-16-5)			X												
22P. PCB-1243 (12672-29-6)			X												
23P. PCB-1260 (11095-82-5)			X												
24P. PCB-1016 (12674-11-2)			X												
25P. Toxaphene (8001-35-2)			X												

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None of substances marked "believed absent" are used in the production process; however this does not preclude one or more of them from being present in trace concentrations in the discharge.

0455



SOURCES OF DAF EFFLUENT
 SAMPAC @ 320 TONS/DAY NOMINAL MAX LEVEL

MJSCHENK 9-25-84